

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

FEB 2 8 2014

<u>CERTIFIED MAIL 7009 1680 0000 7663 6391</u> RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Ms. Susan J. Sevy Environmental Compliance Manager Clean Harbors Environmental Services, Inc. 2930 Independence Road Cleveland, Ohio 44115

> Re: Notice of Violation Compliance Evaluation Inspection

Wastewater Treatment Plant 2900 Rockefeller Avenue Cleveland, Ohio 44115 EPA ID No.: OHD000724153 Transfer Facility 2930 Independence Road Cleveland, Ohio 44115 EPA ID No: MAD039322250

Dear Ms. Sevy:

On December 11, 2013, a representative of the U.S. Environmental Protection Agency inspected the Clean Harbors Environmental Services, Inc. ("CHESI") Wastewater Treatment Plant ("CHESI-WTP") and the CHESI Transfer Facility ("CHESI-TF") in Cleveland, Ohio. The purpose of the inspection was to evaluate CHESI's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6901 et seq., relating to the generation, treatment, and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by CHESI personnel, on a review of records, and on personal observations by the inspector while inspecting the Facility, EPA finds that CHESI – WTP and CHESI – TF are in violation of certain requirements of the Ohio Administrative Code (OAC) and of the United States Code of Federal Regulations (CFR) as follows:

1. A generator who transports, or offers for transportation, hazardous waste for offsite treatment, storage, or disposal must prepare a manifest. A generator must designate on the manifest one facility which is permitted to handle the waste described on the manifest. See, OAC 3745-52-20(A) and (B) [40 CFR § 262.20(a) and (b)].

At the time of the inspection, a 55-gallon drum of "Aerosols for Incineration" and a 55-gallon drum of "Ignitable Waste Liquids" that had been generated from maintenance activities at CHESI-WTP had been transported to and were being stored at the maintenance plant at CHESI-TF. These facilities are not considered to be on contiguous property. A manifest was not used to transport these wastes and CHESI-TF is not permitted to accept hazardous wastes for storage. CHESI-WTP, therefore, violated the above-mentioned generator manifesting requirements.

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2. According to OAC 3745-52-11 [40 CFR § 262.11], a person who generates a solid waste must determine if that waste is a hazardous waste. According to OAC 3745-52-40(C) [40 CFR § 262.40(c)], a generator must keep records of any test results, waste analyses, or other determinations for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal facility.

At the time of the inspection, a container of spent antifreeze was accumulating in the Field Services building at the CHESI-TF. A waste determination for used antifreeze had been made using generator knowledge. The documentation supporting the determination, however, did not appear to consider the properties of the material after use, and was inadequate. CHESI, therefore, violated the above-mentioned hazardous waste determination requirement.

3. A generator of used oil who stores the oil in containers must label or mark clearly those containers with the words "Used Oil." See, OAC 3745-279-22(C)(1) [40 CFR § 279.22(c)(1)].

At the time of the inspection, CHESI-TF was accumulating used oil in a 55-gallon drum located in the maintenance plant. The drum was labeled as "Waste Oil." In the Field Services building, filters containing used oil were hot-draining into a containment pallet. The pallet was not labeled. Also, a 55-gallon container of used coolant was labeled as "Waste Coolant." According to Ms. Sevy, the coolant is managed as used oil. None of these three containers was marked with the words "Used Oil." CHESI, therefore, violated the above-mentioned used oil generator requirement.

At this time, EPA is not requiring CHESI-TF to apply for an Ohio hazardous waste storage permit so long as CHESI-TF immediately stops accepting and storing wastes generated at CHESI-WTP, as noted in Item 1, above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation, and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with each of the above requirements.

You should submit your response to Brenda Whitney, U.S. Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Ms. Whitney at (312) 353-4796.

Sincerely,

Gary J. Victorine, Chief

RCRA Branch

Enclosure

cc: Karen Nesbit, OEPA (Karen.Nesbit@epa.ohio.gov)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, ILLINOIS 60604

Compliance Evaluation Inspection Report

Date of Inspection:	December 11, 2013	
Facility Name:	Clean Harbors	
Facility Address:	2900 Rockefeller Avenue Cleveland, Ohio 44115	dram once imbrass. V 1200 Donah banas. O 1500 bid banas.
EPA RCRA ID Number:	OHD000724153	
Generator Status:	Large Quantity Generator	mas bal III - 1240E)
Transfer Facility Address:	2930 Independence Road Cleveland, Ohio 44115	Principal Company of the Company of
EPA RCRA ID Number:	MAD039322250	
Generator Status:	Conditionally Exempt Small Quantity G	denerator
Facility Contact:	Susan J. Sevy Environmental Compliance Manager	Tracy A. Hallow
U.S. EPA Inspector:	Brenda Whitney - Environmental Engin Resource Conservation and Recovery A Compliance Section 2	
Prepared By: Brenda Whitney Environmental Compliance Sec	Engineer	: 01 / 17/2014 Month / Day / Year
Accepted By: Julie Morris Chief Compliance See	Date Accepted:	1/2///4 Month / Day / Year

Purpose of Inspection

I conducted an unannounced Compliance Evaluation Inspection (CEI or "inspection") of two Clean Harbors Environmental Services, Inc., (CHESI) facilities located in Cleveland, Ohio, on December 11, 2013. The CHESI wastewater treatment plant ("CHESI - WTP") is located at 2900 Rockefeller Avenue in Cleveland, Ohio, and carries the EPA ID number OHD000724153. The CHESI transfer facility ("CHESI – TF") and maintenance garages are under the transporter EPA ID number MAD039322250. This CEI was an evaluation of CHESI's compliance with the RCRA hazardous waste regulations codified in the Ohio Administrative Code and the Code of Federal Regulations.

CHESI – WTP had notified the Ohio Environmental Protection Agency (OEPA) as a large quantity generator (LQG) of hazardous waste generating more than 1,000 kilograms of hazardous waste per month. At the time of the inspection, however, representatives of the facility stated that CHESI - WTP is a small quantity generator, or is possibly conditionally exempt. They also noted that the LQG status is kept because of the slight possibility that their filter cake fails testing procedures or in the event of a non-routine mass disposal from a clean-out or similar happening.

CHESI – TF had notified under the Massachusetts ID number as a non-generator. This facility was operating as a conditionally exempt small quantity generator (CESQG) at the time of the inspection.

Karen Nesbit, an Environmental Specialist with OEPA, was unable to accompany me on this CEI.

Participants

Tracy A. Balcer Facility Coordinator	CHESI
Albert Benavides General Manager	CHESI
Dominic E. Okon Laboratory Manager	CHESI
Luz E. Marrero Compliance Guard – Cleveland Plant	CHESI
Susan J. Sevy – Via Telephone Environmental Compliance Manager	CHESI
Michael Petkovich Director of Facility Operations Waste Water Treatement	CHESI
Brenda Whitney Environmental Engineer	ЕРА

Introduction

Upon arrival at the facility, I displayed my credentials to Ms. Balcer who granted me entrance to the facility. She had me sign into a log book, which did not include any disclaimers, and she gave me a visitor's badge. Ms. Balcer was on the phone with Ms. Sevy at this time. I spoke with Ms. Sevy, who was on route to Cincinnati for a business meeting. The determination was made that she would continue on her way to Cincinnati and would not turn back for the inspection. She requested that we include her in the close-out meeting and that any questions that could not be answered during the inspection be directed to her.

Ms. Balcer introduced me to Mr. Okon, Mr. Benavides, and Ms. Marrero. I delineated the purpose and logistics of the CEI during this introductory meeting. We discussed the processes and waste management practices at both CHESI – WTP and CHESI – TF. I informed the representatives that I would be taking waste-related photographs in each facility as necessary. I also provided Ms. Balcer with three informational handouts: *Onsite Pollution Prevention Assistance (OEPA brochure)*; *P2 Technical Assistance Contacts*; and U.S. EPA Small Business Resources. We discussed EPA's policy regarding confidential business information (CBI) and agreed to make a determination during the close-out discussion as to whether or not to claim CBI for any of the information gathered during the inspection. After this introduction, we departed for a tour of the complex.

Site Description

The following information about CHESI is based on the personal observations of the EPA inspector and on representations made during the CEI by the facility personnel identified above or within the text unless otherwise specified.

The CHESI – WTP includes the laboratory, offices, and wastewater treatment plant. A separate outbuilding houses the Administrative offices. CHESI - TF includes the maintenance department and the truck to truck drum hub, which is another name for CHESI's transfer facility. The mechanics and field services departments are also part of CHESI - TF. The two facilities are located across a public road from one another, and are considered by the OEPA to be noncontiguous property, hence the separate EPA ID numbers.

The CHESI - WTP accepts hazardous inorganic bulk and drum wastes for treatment. Liquid wastes are brought for wastewater treatment, which is a process regulated under the Clean Water Act. According to facility personnel, these wastes are input into the wastewater treatment system within 24 hours of acceptance at the site. Other materials which cannot be processed in the wastewater treatment plant are usually shipped to another Clean Harbors facility — usually Spring Grove or El Dorado. Some waste streams may have 1-5% oil content. The water is decanted from the these loads, and the oil collects in a tank for off-site recycling

Prior to acceptance of a new waste stream at this facility, the generator will provide information to CHESI in a profile, including information regarding oil content and the rebuttable presumption. If the information in the profile is incomplete or appears unusual, the laboratory may reject the waste or ask for a sample of the waste to be shipped to them for testing. If the sample fails, then the generator is responsible for re-testing, or it is sent for third party analysis.

Pre-accepted incoming wastes are delivered to the facility on a hazardous waste manifest. CHESI - WTP terminates the manifest as the Destination Facility. CHESI - WTP fills out an Incoming Truck Tracking Sheet for each load, which details all of the information that accompanies each load from arrival time to residence time in treatment. A physical sample of each load is taken for analysis at the laboratory to determine treatment recipes. The lab runs analyticals of each sample which include, but are not limited to, metals and pH. If the load has unusual characteristics, or is a drum load with several different types of compatible waste in it, a red flag might be attached to the treatment recipe. This notice must be discussed and approved by multiple supervisory levels before the load can be treated. In all cases, the laboratory operators direct the drivers to the appropriate tank or reactor to off-load for treatment. All data from each load is input into the CHESI I-Drive System.

Drivers for bulk loads remain with the shipment until it is cleared for off-loading. In the event that either a partial or full load is to be rejected, the driver is there to accept the load and the original manifest will be updated and sent on with the driver. Drivers that deliver drums to the drum hub at CHESI - TF, however, do not stay with the shipment because they have ten days to process the shipment. These loads, if rejected for treatment at CHESI-WTP, are issued new manifests with CHESI as the "Offerer" of the shipment to an alternate destination as approved by the original generator.

In regards to the treatment process at CHESI-WTP, the system consists very generally of pretreatment reactors, mix tanks, sludge reconditioning tanks and filter presses. Reduction/Oxidation reactions occur in the pre-treatment reactors as needed. The precipitate goes to one of the outdoor mix tanks. The solids content will dictate to which mix tank the sludge is directed. Effluent from the pre-treatment reactor goes into a constant treatment unit (CTU) before being discharged to the sewer. The materials in the mix tanks are then pumped to reconditioning tanks before heading to the filter press for dewatering. The filter cake is sampled to determine characteristics, and has been sent off-site as non-hazardous waste with the last exception having happened approximately 14 years ago.

CHESI - WTP also has the capability of treating F039 listed hazardous waste. This waste is no longer frequently treated at this facility. The equipment is dedicated for the treatment of this waste so that none of the other tanks are compromised with the listing. One of the tanks dedicated to the process, Tank 5, was cleaned out this past year and the materials were determined to be listed. This waste was exported to Canada.

Some reagents for the treatment processes are stored in tanks. Tanks A and B are reserved for used caustic materials that would otherwise be hazardous wastes. According to CHESI - WTP representatives, the used materials have pH value and do not contain any underlying hazardous constituents. Virgin peroxide is stored in another tank.

The main waste generated at the CHESI - WTP is non-hazardous filter cake from the wastewater treatment process. Minimal quantities of hazardous waste are generated from the F039 process and from the laboratory.

As noted before, the CHESI – TF consists of the drum hub, maintenance areas, and the field services department. Wastes generated at the CHESI - TF include used oils, aerosols, and other

maintenance-related wastes such as antifreeze. Universal wastes are generated at both facilities, but are stored at CHESI - TF. Hazardous wastes from off-site customers are delivered to the transfer facility, and may be processed at CHESI - WTP, transshipped to another Clean Harbors facility, or rejected to another alternate destination.

Site Tour

The tour began in the laboratory. Two 5-gallon buckets were observed in a wet-chemistry hood. According to Mr. Okon, the material in the buckets may be used in the pre-treatment system. However, the buckets were both closed and labeled as "Hazardous Waste." A decontamination eye wash and shower was in the laboratory. According to Mr. Benavides, the showers throughout the plant are inspected once a week and are visually checked on a daily basis. A flammable-proof cabinet in the laboratory held several containers of materials that were either to be used again or were possibly no longer usable (See Appendix A: Photograph 1). The status of some of the materials was unclear.

The tour continued outside. The storage tanks for used oil, peroxide, and used caustic were in a secondary containment dike. The used oil tank was labeled as "Used Oil" (See Appendix A: Photograph 2). One additional tank in the area was empty at the time. It will be used for calcium chloride in the sludge conditioning process.

We next passed Station 1, which is the drum processing station. Empty containers are sent to the Clean Harbors in Hebron, Ohio, to be shredded. If the drums cannot be emptied, they are rejected with a new manifest. Solids that cannot be treated in the process are collected in a 30-gallon hazardous waste satellite container near the loading dock. The drum was labeled as "Hazardous Waste" and was closed.

The pre-treatment area inside the building includes the pre-treatment tanks, scrubbers and chemical manifolds. No hazardous waste was observed in this building. The sludge from the pretreatment tanks empties in to the mixing tanks outside. Also in this tank farm is a 200,000-gallon tank which discharges the treated effluent directly to the sewer.

Back inside the plant, I observed the 15,000-gallon CTU, which is used to break up excess polymer in the wastewaters. Ferric sulfate or alum are added to this tank to drop out precipitates to be sent to the mix tanks. The effluent is sent to the discharge tank. The sludge conditioning tanks are also in this building. The sludge is brought back from the mixing tanks to these batch tanks. This stage is where the characteristics of the wastes are eliminated with the addition of lime. This is also a polymer break-up stage.

The sludge is then transferred to the filter presses, which process approximately 7,000 gallons of waste an hour. The filter cake drops out into a dump trailer. Clean Harbors generates a load and a half per operating day. A silo of dry lime was located just outside the door of the filter press area.

The tour continued to the Administration building, where I proceeded to review some records. From this building, we went across the street to the CHESI - TF. At this address, we observed the truck maintenance shop, the drum hub, and the field services storage and maintenance building.

In the drum hub, it did not appear as though any waste was being generated. The containers of waste in the area were to be transferred to another truck for shipment to another Clean Harbors facility. Each of the containers that could be seen had labels and appeared to be in good condition (See Appendix A: Photograph 3).

In the truck maintenance shop, three 55-gallon drums of waste were positioned against one wall. One container was labeled as "Waste Oil," and the second drum held "Ignitable Waste Liquids." (See Appendix A: Photograph 4). The third drum contained "Aerosols for Incineration" and was marked with a start date of accumulation from 11/13/13 (See Appendix A: Photograph 5). Both the second and third drums were labeled as "Hazardous Waste". Universal waste was also stored in this area (See Appendix A: Photograph 6). Four boxes of used lamps were labeled as "Universal Waste," were closed, and were marked with a start date of accumulation from 11/13/2013. Three 5-gallon buckets of batteries were also labeled as "Universal Waste."

According to Ms. Sevy, the maintenance crew will also work at the CHESI – WTP site. Maintenance wastes that are generated at CHESI – WTP are stored in the maintenance area at the CHESI – TF. These wastes are sent off-site under the CHESI – WTP EPA ID number. The labels on the containers of hazardous waste identified in the above paragraph were marked with the CHESI – WTP ID number.

In the Field Services storage building, a 55-gallon drum and 330-gallon tote were labeled as "Used Oil" (See Appendix A: Photograph 7). Another 55-gallon drum was labeled as "Waste Coolant" (See Appendix A: Photograph 8). Oil filters are put out to drain into a secondary containment pallet, which was not labeled (See Appendix A: Photograph 9). A third 55-gallon drum in the area held spent antifreeze and was labeled as "Anti-Freeze" (See Appendix A: Photograph 10). It was not known at the time of the inspection if the used coolant and antifreeze were to be recycled or managed as wastes.

The tour ended at the outdoor storage pad for outgoing containers of waste at the CHESI - WTP. Twenty-one pallets of rejected wastes in containers of various shapes and sizes were stored in this area at the time of the inspection (See Appendix A: Photographs 11 and 12). According to facility personnel, Clean Harbors can hold on to these rejected containers for a maximum of 60 days before preparing a new manifest and signing as the offerer of the wastes either to an alternate disposal facility or back to the generator. Each of the containers appeared to be in good condition and was labeled.

Records and Emergency Preparedness Review

Contingency Plan: The contingency plan for the CHESI – WTP was last revised on 7/18/12. The plan included a list of emergency coordinators with phone numbers and addresses. The plan also included an emergency equipment list complete with descriptions, capabilities and locations. Evacuation procedures are delineated, as are arrangements with emergency response authorities including police and fire departments, hospitals, and the CHESI emergency field services team. The plan is distributed to all emergency response authorities.

Personnel Training Requirements: The CHESI training records are maintained in an on-line database. An 8-hour annual RCRA class and a separate training class for the contingency plan is provided for employees whose job descriptions include hazardous waste management. The most recent classes were presented in May, 2013, for RCRA and August, 2013, for the contingency plan.

<u>Manifests</u>: Hazardous waste manifests for wastes that are generated on-site, as well as for those wastes that are rejected from customers were reviewed. The manifests appeared complete and are kept on-site for at least three years.

Waste Profiles: I reviewed profiles for the following waste streams:

- Filter cake generated from the presses at the end of the wastewater treatment process. The analytical results for this material indicate non-hazardous waste.
- Waste generated from the Tank 5 cleanout Because the material in this tank was generated from treating F039 listed waste, it carried several waste codes including F039.
- Used oil the profile, which is a corporate profile, meaning that the same profile is used for every CHESI facility, indicates that there are zero total halogens in this waste stream. The oil is sent for recycling.
- Antifreeze the profile for this material indicates generator knowledge as the basis for
 waste determination. Antifreeze may become contaminated with heavy metals during use
 and may become hazardous. Generator knowledge does not account for the contaminants
 that may be introduced to the antifreeze during use. No analysis data was available for
 this waste stream.

<u>Weekly Inspections of Container Storage</u>: Inspections of the 90-day pad are conducted at least weekly at CHESI-WTP. Records are kept for at least three years.

Closing Conference

The following items were discussed with Clean Harbors' personnel at the close of the inspection:

- CBI A determination was made that none of the information discussed or documents taken by Ms. Whitney during the inspection would be considered CBI.
- Weekly inspections
- Labeling of used oil, coolant, and antifreeze containers
- Satellite accumulation requirements
- Future closing of the drum hub.

Appendices

Appendix A: Photograph Log

Appendix B: Checklists

Appendix C: Documents received from CHESI during the inspection.

Appendix D: Email correspondence between Susan Sevy of CHESI and Brenda Whitney of EPA. Includes attachments.

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Appendix A

Photograph Log

Inspection Date: December 11, 2013

Facility Name and ID Number:

CHESI - WTP

EPA ID: OHD000724153

CHESI - TF

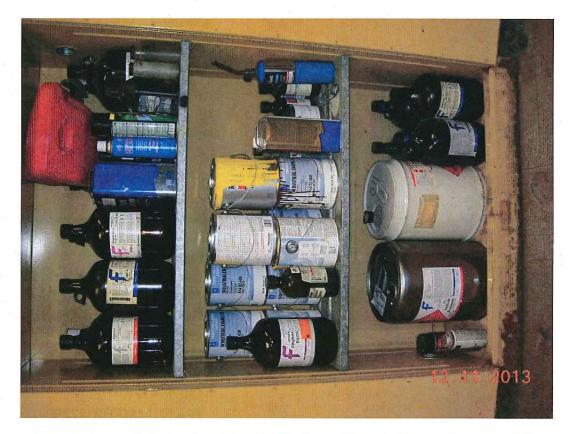
EPA ID: MAD039322250

Inspector and Photographer:

Brenda Whitney Compliance Section 2 RCRA Branch Land and Chemicals Division

Camera Used:

Nikon Cool Pix P4 VR Serial Number: 30530701



Photograph 1 – This photograph is oriented on its left side. This flammable proof cabinet was located in the laboratory at CHESI-WTP. The containers held a combination of usable materials and waste. Not all of the containers were clearly marked as one or the other.



Photograph 2 – The used oil tank at CHESI – WTP was labeled as "Used Oil."



Photograph 3 -



Photograph 4 – These containers were located in a plant maintenance area at CHESI – TF. These wastes may have been generated at CHESI – WTP. The right-most drum held "Waste Ignitable Liquids." The left-most container held used oil and was labeled as "Waste Oil."



Photograph 5 – This container was located next to the drums identified in Photograph 4, above. This container held "Aerosols for Incineration." This waste may have been generated at CHESI – WTP.



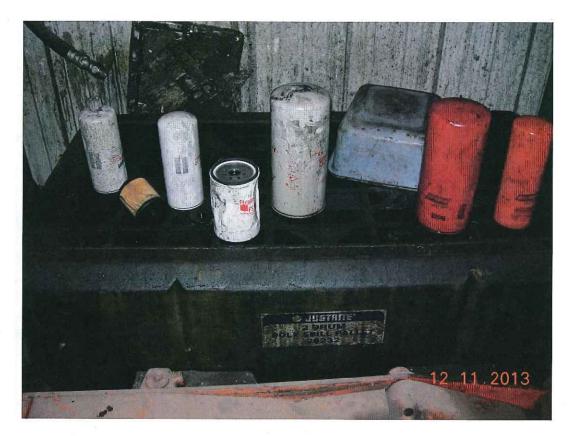
Photograph 6 – Universal waste was stored in the same area as the wastes identified in photographs 4 and 5. The containers of lamps and batteries were closed and labeled.



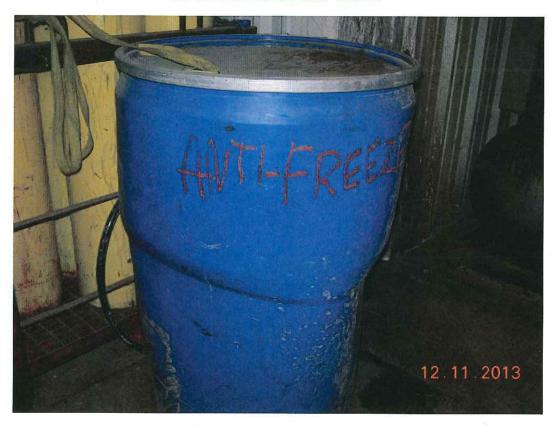
Photograph 7 – This tote of used oil was located in the Field Services portion of the CHESI – TF. The tote was labeled as "Used Oil Only."



Photograph 8 – This 55-gallon drum of coolant was located in the Field Services portion of the CHESI – TF and was labeled as "Waste Coolant."



Photograph 9 – Oil filters were draining into a containment pallet in the Field Services portion of the CHESI - TF. The pallet was not labeled with the words "Used Oil."



Photograph 10 – A drum of waste antifreeze was located in the Field Services portion of CHESI – TF. The container was marked with the word "Anti-Freeze."



Photograph 11 – These containers have been rejected for treatment at the CHESI-WTP, and are being temporarily stored on a concrete pad outside of the plant to be shipped to an alternate designated facility or back to the generator.



Photograph 12 – See caption for Photograph 11.

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Appendix B

Checklists

Inspection Date:

December 11, 2013

Facility Name and ID Number:

CHESI - WTP

EPA ID: OHD000724153

CHESI-TF

EPA ID: MAD039322250

Inspector:

Brenda Whitney Compliance Section 2 RCRA Branch Land and Chemicals Division

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		LARGE QUANTITY GENERATOR REQUIREMENTS		מע					
		COMPLETE AND ATTACH A PROCESS DESCRIPTION SU							
SQG: LQG: NOTE	CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste. SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month. LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month. NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.								
		nent Used:						-	
	RAL R	EQUIREMENTS			Complete Spanish	3		-	
1.	52-11]	Il wastes generated at the facility been adequately evaluated? [3745-	Yes	X		N/A			
2.	Are red 40(C)]	cords of waste determination being kept for at least 3 years? [3745-52-	Yes	X	No 🗌	N/A			
3.	Has th	e generator obtained a U.S. EPA identification number? [3745-52-12]	Yes	M	No 🗌	N/A			
4.	Were a 41(A)]	annual reports filed with Ohio EPA on or before March 1 st ? [3745-52-	Yes	X	No 🗌	N/A			
5.		nual reports kept on file for at least 3 years? [3745-52-40(B)]	Yes	X	No 🔲	N/A			
6.	Has th to othe 3734.0	e generator transported or caused to be transported hazardous waste er than a facility authorized to manage the hazardous waste? [ORC 12(F)]	Yes	M	No 🗌	N/A			
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]								
8.		he generator accumulate hazardous waste?	Yes	X	No 🗌	N/A			
NOTE	: If the	LQG does not accumulate or treat hazardous waste, it is not subject to 5 still apply, e.g., annual reports, manifest, marking, record keeping, LDR,	2-34 s. etc.	tanda	rds. All d	ther			
9.									
NOTE	: If F00	06 waste is generated and accumulated for > 90 days and is recycled see	3745-	-52-34	f(G)&(H).				
10.	Does t	he generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]			NIP				
	а.	Container that meets 3745-66-70 to 3745-66-77?	Yes		No 🗀	N/A			
	b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes		No. 🔲	N/A	X		
	C.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes		No 🗌	N/A	Ø		
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes		No 🗌	N/A	×		
NOTE	E: Com	plete appropriate checklist for each unit.							
	······	ste is treated to meet LDRs, use LDR checklist.						7	
11.	Does	the generator export hazardous waste? If so:	Yes	X	No 🗌	N/A			
		OWEVER- THE BURTON, MI CHESI FACULTY IS PRIMARY ENDO		AND			s Reco	\$55	
	a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes		No L	33 13			
	b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes		No 🔲	N/A	<u> </u>		
	C.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes		No □	N/A	X		
	d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes		No □	N/A	Ø		

	e.	Are export related documents being maintained on-site? [3745-52-	Yes		No N/A	N
		57(A)] YES.				
		REQUIREMENTS				
12.		all hazardous wastes shipped off-site been accompanied by a est? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes	X	No 🗌 N/A	
13.		items (1) through (20) of each manifest been completed? -52-20(A)(1)]&[3745-52-27(A)]	Yes	X	No 🗌 N/A	
		EPA Form 8700-22(A) (the continuation form) may be needed in addition ms (21) through (35) must also be completed. [3745-52-20(A)(1)]	to For	m 87	00-22. In these	
14.		each manifest designate at least one facility which is permitted to e the waste? [3745-52-20(B)]	Yes	X	No 🔲 N/A	
		generator may designate on the manifest one alternate facility to handle to which prevents the delivery of waste to the primary designated facility. [37]				
15.	If the design	transporter was unable to deliver a shipment of hazardous waste to the nated facility, did the generator designate an alternate TSD facility or transporter instructions to return the waste? [3745-52-20(D)]	Yes		No 🔲 N/A	K
16.		the manifests been signed by the generator and initial transporter? -52-23(A)(1)&(2)]	Yes	X	No 🔲 N/A	
		ind the generator that the certification statement they signed indicates: 1) transportation and 2) they have a program in place to reduce the volume				
17.	If the	generator received a rejected load or residue, did the generator:				. ,
	a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)	Yes		No. 🔲 N/A	×
	b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes		No 🔲 N/A	X
	C.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes		No 🔲 N/A	X
18.	within gener	generator did not receive a return copy of each completed manifest 35 days of the waste being accepted by the transporter, did the ator contact the transporter and/or TSD facility to check on the status of aste? [3745-52-42(A)(1)]	Yes		No II N/A	
19.	If the	generator has not received the manifest within 45 days, did the ator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes		No 🔲 N/A	X
20.		gned copies of all manifests and any exception reports being retained least three years? [3745-52-40]	Yes	X	No 🔲 N/A	
facility accun	r can ac nulate ti	nerator who sends a shipment of hazardous waste to a TSD facility with the except and manage the waste and later receives that shipment back as a re the waste on-site for <90 days or <180 days depending on the amount of the hth. [3745-52-34(M)]	ejected	load	or residue may	•
storag and tra a trans	e or tre ansport sfer fac	e generated at one location and transported along a publicly accessible re eatment on a contiguous property also owned by the same person is not co er requirements must be met. To transport "along" a public right-of-way to ility or have a permit because this is considered to be "off-site." For addita OAC rule 3745-50-10.	onside he desi	red "d tinatio	on-site" and ma on facility has to	nifesting act as
		TRAINING		. ,		
21.	hazard	the generator have a training program which teaches facility personnel dous waste management procedures (including contingency plan	Yes	X	No □ N/A	
22.	Does of ensure involvi	the personnel training program, at a minimum, include instructions to that facility personnel are able to respond effectively to emergencies ing hazardous waste by familiarizing them with emergency procedures, ency equipment and emergency systems (where applicable)? [3745-(A)(3)]	Yes	X	No II N/A	

requir	ed to pr e m ents	acility employees that receive emergency response training pursuant to rovide separate emergency response training, provided that the overall to of OAC 3745-65-16(A). [3745-65-16(A)(4)]	OSHA r acility tr	egula aining	g meets all the	y is not
23.	waste	personnel training program directed by a person trained in hazardous management procedures? [3745-65-16(A)(2)]	Yes	X	No. □ N/A	
24.	assigr	w employees receive training within six months after the date of hire (or nment to a new position)? [3745-65-16(B)]	Yes	X	No. 🔲 N/A	
25.	period 15 mo	the generator provide refresher training to employees during each from January 1 st to December 31 st and does each training occur within onths after the previous training? [3745-65-16(C)]	Yes	×	No 🔲 N/A	
26.	Does	the generator keep records and documentation of:			darkeelini heb	
	a.	Job titles? [3745-65-16(D)(1)]	Yes		No 🗍 N/A	
	b.	Job descriptions? [3745-65-16(D)(2)]	Yes	Ž.	No □ N/A	
	C.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes	Ď	No. 🗌 N/A	
	d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes	K	No 🔲 N/A	
27.	are tra	aining records for current personnel kept until closure of the facility and aining records for former employees kept for at least three years from the the employee last worked at the facility? [3745-65-16(E)]	Yes	X	No 🔳 N/A	
hazar includ	The idous w	following section can be used by the inspector to document that all pers aste management have been trained. The employees who need trainin ollowing: environmental coordinators, drum handlers, emergency coordi aste inspections, emergency response teams, personnel who prepare n	g (writte nators, p	n and ersor	l/or on-the -job)	may ct
Job F	erform	ed Name of Employee	2		Date Traine	<u>ed</u>
CON	TINGEN	ICY PLAN		.J		
28.	Does huma	the owner/operator have a contingency plan to minimize hazards to n health or the environment from fires, explosions or any unplanned se of hazardous waste? [3745-65-51(A)]	Yes	X	No 🔲 N/A	
29.		the plan describe the following:				
	a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes	X	No. □ N/A	
	b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes	Ø	No 🗌 N/A	
	C.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes	M	No 🗌 N/A	
	d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes	X	No 🔲 N/A	
	e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]		X	No 🗔 N/A	
other suffic requi	emerge ient to d rements Guidan	e facility already has a "Spill Prevention, Control and Countermeasures is facility already has a "Spill Prevention, Control and Countermeasures is ency plan, the facility can amend that plan to incorporate hazardous was comply with OAC requirements. The facility may develop one contingents. Ohio EPA recommends that the plan be based on the "National Respoce (One Plan)." [3745-65-52(B)]	ste mana cy plan	agem which	ent provisions to n meets all regu Integrated Con	hat are latory
30.	Is a c	opy of the plan (plus revisions) kept on-site and been given to all gency authorities that may be requested to provide emergency services i-65-53(A)&(B)]	? Yes	X —	No 🗌 N/A	

31.		ne generator revised the plan in response to rule changes, facility, ment and personnel changes, or failure of the plan? [3745-65-54]	Yes	X	No 🗓 N/A			
32.	Is an 65-55	emergency coordinator available at all times (on-site or on-call)? [3745-]	Yes	Ø	No □ N/A			
all ope	erations ds withi	emergency coordinator shall be thoroughly familiar with: (a) all aspects of s and activities at the facility; (c) the location and characteristics of waste in the facility; (e) facility layout; and (f) shall have the authority to commit to the contingency plan.	handle	d; (d)	the location of	all		
		Y PROCEDURES						
33.		nere been a fire, explosion or release of hazardous waste or hazardous constituents since the last inspection? If so:	Yes		No 🗶 N/A			
	а.	Was the contingency plan implemented? [3745-65-51(B)]	Yes		No 🔲 N/A	Ķ		
	b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes		No 📋 N/A	K		
	C.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes		No 🔲 N/A	X		
explos enviro	sion, or nment.	3745-65-51(B) requires that the contingency plan be implemented immed release of hazardous waste or hazardous waste constituents, which could						
		NESS AND PREVENTION						
34.	unplar	facility operated to minimize the possibility of fire, explosion, or any ned release of hazardous waste? [3745-65-31]	Yes	X	No N/A			
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:							
	a.	Internal communications or alarm system? [3745-65-32(A)]	Yes	X	No 🔲 N/A			
	b.	Emergency communication device? [3745-65-32(B)]	Yes	X	No 🔲 N/A			
	C.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes	X	No 🔲 N/A			
	d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes	X	No □ N/A			
		y that the equipment is listed in the contingency plan.	1		Presidente de la companya del companya de la companya del companya de la companya			
36.	operat	ergency equipment tested (inspected) as necessary to ensure its propertion in time of emergency? [3745-65-33]	Yes	X	No 🔲 N/A			
37.	[3745-	nergency equipment tests (inspections) recorded in a log or summary? 65-33]	Yes	X T	No 🔲 N/A			
38.	comm not red	rsonnel have immediate access to an internal alarm or emergency unication device when handling hazardous waste (unless the device is quired under 3745-65-32)? [3745-65-34(A)]	Yes	X	No 🔲 N/A			
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]							
40.	or spil	quate aisle space provided for unobstructed movement of emergency control equipment? [3745-65-35]	Yes	X	No 🔲 N/A			
41.	possib	e generator attempted to familiarize emergency authorities with le hazards and facility layouts? [3745-65-37(A)]	Yes	Æ	No 🔲 N/A			
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]							

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SATE	ELLITE	ACCUMULATION AREA REQUIREMENTS				
43.	Does	the generator ensure that satellite accumulation area(s):		1B1		
	a.	Are at or near a point of generation? [3745-52-34(C)(1)]	Yes		No 🗵 N/A	
	b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]	Yes	ð,	No 🔲 N/A	
	C.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]	Yes	Ø	No 🔲 N/A	
	d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]	Yes		No 🔲 N/A	Ø
	e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]	Yes	½	No 🔲 N/A	
	f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]	Yes	X X	No N/A	
44.		generator accumulating hazardous waste(s) in excess of the amounts in the preceding question? If so:	Yes		No ⊠ N/A	
	a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]	Yes		No 🗌 N/A	
	b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]	Yes		No 🔲 N/A	凶
gene acute gene	ration in hazaro ration.	satellite accumulation area is limited to 55 gallons of hazardous waste acc the process under the control of the operator of the process generating to lous waste). There could be individual waste streams accumulated in an	he was area fr	te (le om di	ess then 1 quart ifferent points o	for f
		ANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS	1	No	NE OBSER	
45.		ne generator marked containers with the words "Hazardous Waste?" -52-34(A)(3)]	Yes		No 🔲 N/A	×
46.	Is the	accumulation date on each container? [3745-52-34(A)(2)]	Yes		No 🔲 N/A	Ŕ
47.	Are h	azardous wastes stored in containers which are:				
	a.	Closed (except when adding/removing wastes)? [3745-66-73(A)]	Yes		No 🗓 N/A	X
	b.	In good condition? [3745-66-71]	Yes		No □ N/A	
	C.	Compatible with wastes stored in them? [3745-66-72]	Yes		No □ N/A	X.
	d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]	Yes		No 🔲 N/A	×
		ord location on process summary sheets, photograph the area, and record				
48.		container accumulation areas(s) inspected at least once during the d from Sunday to Saturday? [3745-66-74]	Yes	X.	No 🔲 N/A	
	a.	Are inspections recorded in a log or summary? [3745-66-74]	Yes	X	No □ N/A	
49.	meter	ontainers of ignitable or reactive wastes located at least 50 feet (15 s) from the facility's property line? [3745-66-76]	Yes	X	No □ N/A	
50.	mean	ontainers of incompatible wastes stored separately from each other by sof a dike, berm, wall or other device? [3745-66-77(C)]	Yes		No 🔲 N/A	À
51.	mate	generator places incompatible wastes, or incompatible wastes and rials in the same container, is it done in accordance with 3745-65-17(B)? i-66-77(A)]	Yes		No 🔲 N/A	区

52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes		No 🔲 N/A	Y
mixtur	: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignit e or commingling of incompatible wastes, or incompatible wastes and materials irable conditions or threaten human health or the environment.	able or so that	reac it do	ctive waste, and es not create	the
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes		No 🔲 N/A)A
that cl tank, c 34]	Please provide a description of the unit and documentation provided by the geosure was completed in accordance with the closure performance standards. If closure must also be completed in accordance with OAC 3745-66-97 (except for	the ge paragi	nerat	or has closed a	<90 day
PRE-1	RANSPORT REQUIREMENTS ACCORDING TO FACILITY RI	સ્ વ ડ			
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes	M	No 🔲 N/A	
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes	M	No 🔲 N/A	
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes	X	No □ N/A	
NOTE	Continue with the generator LDR requirements on the next page.				

			GENERATOR LUR REQUIREMENTS						
NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. It									
generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist. GENERAL REQUIREMENTS									
						Service and April 10	11111111111111111111111111111111111111		(C)
1.	If LDR	s do no	t apply, does the generator have a statement that lists how	Yes		No		N/A	X
			generated, why LDRs don't apply and where the HW went?			Market N			
		270-07			* 1				
2.			ator determine if the HW/soil must be treated to meet the LDR	Yes	X	No	Ш	N/A	
			ndard prior to disposal? Generator knowledge or testing may		•				
			5-270-07(A)(1)] If not,			(2000000)			
	a.		e generator send the waste to a permitted HW TREATMENT ? [3745-270-07(A)(1)]	Yes	1X	No		N/A	
NOTE	: This is	s done i	by determining if the HW/soil contains levels of constituents grea	ater the	n the	e level	s giv	en in	its
IDR	reatmei	nt stano	lard in 3745-270-40. However, if a specific treatment method is	given i	in 374	45-27	0-40	for th	e
HW. n	o deter	minatio	n is required [3745-270-07(A)(1)(b)]. If soil, generator can choo	se to h	ave s	soil tre	ated	to LI	OR
			270-49 (alternative treatment levels for soils).						
3.			erator have documentation of how he determined whether the	Yes	X	No		N/A	
			s or does not meet the LDR treatment standard in 2, above?			A PARTICIPATION OF THE PARTICI			
			(A)(6)(a) or 3745-270-07(A)(6)(b)]			neathern.			
4.			erator keep the documentation required in #2, above, on-site	Yes	M	No		N/A	
,,	for at I	east the	ree years from the last date the HW/soil was sent on-site/off-	. 00	₩,	Nilsona Section			السيا
			nent/disposal? [3745-270-07(A)(8)]		,	\$1000000000000000000000000000000000000	Tarriott f		
5.			erator generate a listed HW that exhibits a characteristic? If	Yes	X	No	П	N/A	
	yes,	J			x-4			, .	
	a.	Did the	e generator determine if the listed HW exhibits a characteristic	Yes	M	No		N/A	
	α.		not treated under the LDR treatment standard for the listed	103	X.	110		14//~	<u></u>
			3745-270-09(A)]			detelen			
EODI			06 that exhibits the characteristic for silver or K062 that is corros	ive D	002	Revie	w I F)R	
			n 3745-270-40 to determine what constituents the listed HW is to			1 (0 4)0	**	,,,	
			rator determine if its characteristic HW contains underlying	F	ילא. מל	NIE	a ala	NI/A	\Box
6.	bazar	e gener	instituents that need to be treated? [3745-270-09(A)]	Yes	47	No		N/A	
NOTE				ro in th	o LIM	V at la	uolo	ahov	o tho
NOTE	:: I NIS I	s aone	by evaluating which underlying hazardous constituents (UHC) a	u to bi	e nvi	v at its	onio	carbo	e uie
			standards given in 3745-270-48. This requirement does not appl	y to m	jii w	ai viy	arno	Carbo	ווכ
-			TOC) D001 wastes or listed HWs.						
			mentation of this determination is not required.				~/		
7.		_	rator treat his HW /soil on-site to meet the LDR treatment	Yes		No	X	N/A	
	standa	ard?							
NOTE			guestion #16.			/			
8.	Did th	e gener	rator send a one-time LDR notification form to the TSD with	Yes	X	No		N/A	
	the fire	st shipn	nent to that facility? [3745-270-07(A)(2)]		`				
	a.	If the	generator chose not to make the determination of whether his	Yes		No		N/A	∇
			must be treated, did he send a notice to the TSD facility with	, 55					7
			shipment? [3745-270-07(A)(2)] If so, did the notice include:			3000000000	edan de presidi		
		i	Applicable HW codes?	Yes		No		N/A	Q(
						TOTAL PROPERTY		,,	7
		ii	Manifest number of the first shipment to the TSD?	Yes		No		N/Δ	RZ
1				103	ш	***		(14-31
<u> </u>		iii	A statement that conveys that the HW may or may not be	Yes		No		NI/A	Ø
			subject to the LDR treatment standards and the TSD must	res	لبيا	2544		IWA	K
			make that determination."?			\$1506E			
9.	Did th	e dene	rator resubmit the LDR notification form to the TSD when the	Yes		No	STATE OF	N/A	M
³ .			or the generator used a new TSD? [3745-270-07(A)(2)]	162	لبيا	INU		1W//\	ĬΖ
10		_		\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	N/	46000	ereni. Tanta	N1/A	
10.	Does	me ger	erator have a copy of the LDR notification form/notice on file?	Yes	Z,	No		IN/A	Ш
<u> </u>	l			1		HONESPA	gazaketah		

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	[3745	745-270-07(A)(2)]					
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes	X	No 🗀	N/A	
NOTI	FICATI	ON FORM	L		Externation values	20.1	
11.	Does	the LDR Notification form contain the following information:	-				
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes	X	No L	N/A	
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes	Ø	No 🗆 🔃	N/A	
	C.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes	K	No [N/A	
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes	X	No 🗔	N/A	
		stewater contains <1% by wt. total suspended solids (TSS) and <1% by					
		ter or non-wastewater, the HW can be tested using for example, Standa hod 9060a for TOC.	ard Me	thods	(SM) 16	0.2 fo	r TSS,
300-0	e.	Designation of the waste subcategory when applicable?	Yes	ĪΣ	No 🔲	NI/A	
	.	[3745-270-07(A)(2)]	162	À	INU E	* IN/A	لسسا
		rategories are found on the LDR treatment standards table under the ap abcategories	plicab	le wa	ste code.	Not a	all
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes	X	No 🗌	N/A	
		equired if the waste is high TOC D001 or the TSD tests its treatment resonstituents.	sidues	for a	ll underly	ing	
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes	X	No 🛄	N/A	
NOTE	. Not r	equired if the TSD tests its treatment residues for all underlying hazardo	ous coi	nstitu	ents.		
		DILUTION					
12.		HW treated by burning?	Yes		No 💢	N/A	
13.		go to #15. HW a metal-bearing HW?					rechi
			Yes		No 🗌	N/A	<u> </u>
metals	s. A list	rally, metal-bearing HWs contain heavy metals above TCLP levels or we of the restricted metal-bearing HWs is given in the Appendix to 3745-2			ie to the	preser	nce of
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]					
		i. Contains > 1% TOC?	Yes		No 🗌	N/A	Z
		ii. Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes		No 🗌	N/A	区
		iii. Is made up of combustible material e.g., paper, wood, plastic?	Yes		No 🗌	N/A	B
		iv. Has a reasonable heating value (e.g., > 5000 Btu)?	Yes		No 🗌	N/A	Þ
		v. Co-generated with a HW that must be combusted?	Yes		No 🗌	N/A	X
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes	Hermon	No 🗌	N/A	Ø
15.	Was th	ne HW treated by wastewater treatment?	Yes		No 💢	N/A	

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			<i>I</i> Z
	a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes □ No □ N/A 💆
NOTE	Ξ: <i>If</i> "\	Yes", HW is improperly being treated by dilution.	
	b.	Does the waste carry the D001 code and contain ≥10% TOC?	Yes □ No □ N/A 🂢
	C.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes ☐ No ☐ N/A 🂢
		ne answers to b & c are "yes" and "no", respectively, waste is improperly in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].	being treated by dilution and
		st of separation/recovery processes are given in 3745-270-42 under RO	RG.
	, , , , , , ,	or or ookaranaming and the best of the second of the secon	

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	•					
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					•	
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			·			

USED OIL INSPECTION CHECKLIST

GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters. 2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp. **PROHIBITIONS** Does the generator manage used oil in a surface impoundment or waste pile? If Yes yes: Is the surface impoundment or waste pile regulated as a hazardous waste a. Yes N/A No management unit? [3745-279-12(A)] NOTE: For example, used oil contaminated scrap metal stored in a pile. Is used oil used as a dust suppressant? [3745-279-12(B)] Yes Is off-specification used oil fuel burned for energy recovery in devices specified in Yes 3745-279-12(C)? NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum). **GENERATOR STANDARDS** Does the generator mix hazardous waste with used oil? If so, Yes Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)] Yes No N/A NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279. Does the generator of a used oil containing greater than 1,000 ppm total halogens ∏ N/A Yes No. manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)] NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted. Does the generator store used oil in tanks, or containers; or a unit(s) subject to No □ N/A 6. regulation as a hazardous waste management unit? [3745-279-22(A)] Are containers and aboveground tanks used to store used oil in good condition 7. N/A Yes with no visible leaks? [3745-279-22(B)] Are containers, above ground tanks, and fill pipes used for underground tanks 8. No N/A Yes clearly labeled or marked "Used Oil?" [3745-279-22(C)] Has the generator, upon detection of a release of used oil, done the following: 9 Yes No [3745-279-22(D)] Stopped the release? ∏ N/A Yes No a. Contained the release? Yes No N/A b. Cleaned up and properly managed the used oil and other materials? No N/A C. Yes Repaired or replaced the containers or tanks prior to returning them to d. No N/A Yes service, if necessary? **ON-SITE BURNING IN SPACE HEATER** Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so: Does the heater burn only used oil that owner/operator generates or used a. Yes No oil received from household do-it-yourself (DIY) used oil generators? Is the heater designed to have a maximum capacity of not more that 0.5 b. No Yes N/A million BTU per hour?

	C.	Are the combustion gases from heater vented to the ambient air?	Yes		No 🔲 N/A	X			
NOT	E: A:	sh accumulated in a space heater must be managed in accordance with 3745-27	'9-10(E).					
GEN	ERA	OR TRANSPORTATION							
11.		s the generator have the used oil hauled only by transporters that have	Yes	M	No 🔲 N/A				
	obta	ined a U.S. EPA ID#? [3745-279-24] GAMPONNENTAL Specialists in	× -	/ 1					
12.	If th	e generator self-transports used oil to an approved collection site or to an							
	agg	regation point owned by the generator: [3745-279-24]							
	a.	Does the generator transport used oil in a vehicle owned by the generator or	Yes	П	No N/A	X			
		an employee of the generator? [3745-279-24]				,			
	b.	Does the generator transport more than 55 gallons of used oil at any time?	Yes		No N/A	√			
		[3745-279-24]	Bittigetijn			7-3			
NOT	E: U	sed oil generators may arrange for used oil to be transported by a transporter	withou	t a L	I.S. EPA ID # if	f the			
used	oil is	reclaimed under a contractual agreement (i.e., tolling arrangement).							
COL	LECT	ION CENTERS AND AGGREGATION POINTS							
13.	Is th	e DIY used oil collection center in compliance with the generator standards in	Yes		No 🔲 N/A	X			
	374	5-279-20 to 3745-279-24? [3745-279-30]		_					
14.	is th	e non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes		No 🔲 N/A	X			
15.	Is th	e used oil aggregation point in compliance with the generator standards in	Yes	П	No 🔲 N/A	不			
	3745-279-20 to 3745-279-24? [3745-279-32]								
NOT	NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for								
	used oil collection centers and aggregation points.								

	CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET								
SQG: Bet LQG: ≥ 1,	ween 1 000 Kg	. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg 00 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calenda . (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely haza at from gallons to pounds: <u>Amount in gallons x Specific Gravity x 8.345</u>	ar mon rdous	th. waste	e in a calenda				
Safety Eq									
WASTE E									
1.	Have a [3745-	ll wastes generated at the facility been adequately evaluated? 52-11] ———————————————————————————————————	Yes		No. 124 N/A	۱ [
		LASSIFICATION	i		·				
2.		he generator produce <100 kg. of hazardous waste per month? ionally exempt small quantity generator ("CESQG")]	Yes	X	No 🔲 N/A	۱ [
NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator ("SQG"). If so, complete the Small Quantity Generator Requirements checklist.									
OFF-SITI	E SHIPI	MENT OF HAZARDOUS WASTE							
3.		he CESQG ensure delivery of hazardous waste(s) to an off-site ted TSD? [3734.02(F)] Complete Wastes With Wastewater	Yes	XI.	No □ N/	۱ ۹			
TREATM		FHAZARDOUS WASTE TREATMENT PLANT WHSTE					,		
4.	Does t	he generator treat hazardous waste in a:							
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes		No 🔲 N/	4	Ď.		
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes		No 🔲 N/	Δ.	Ø		
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes		No 🗀 N/	4	X		
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes		No 🔲 N/	Д	D /		
NOTE: C	omplete	e appropriate checklist for each unit.							
		SQG conducts treatment they are subject to the LQG requirements.							
		s treated to meet LDRs, use LDR checklist.							
		JS WASTE WITH USED OIL							
5.	Does	the CESQG mix its hazardous waste with used oil for the purpose of g for energy recovery? [3745-51-05(J)] If so:	Yes		No 🔯 N/	A			
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes		No 🔲 N/	A	M		

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SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS - BATTERIES AND LAMPS									
Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more									
		ity Universal Waste Handler (SQUWH) = 5,000 Kg or less							
	IBITIO								
1.		e SQUWH dispose of universal waste? [3745-273-11(A)]	Yes	П	No 🗖 N/A	П			
2.		e SQUWH dilute or treat universal waste, except when responding to	Yes		No N/A				
Z.		es as provided in OAC rule 3745-273-17 or managing specific wastes	153	ica con la	NO A NA				
		vided in OAC rule 3745-273-13? [3745-273-11(B)]	90.000.000	2011/04/04/04	हों। -				
WAST	EMAN	IAGEMENT AND LABELING/MARKING							
UNIVE	RSAL	WASTE BATTERIES							
3.		tteries that show evidence of leakage, spillage or damage that could leaks contained? [3745-273-13(A)(1)]	Yes		No □ N/A	X			
4.	compa	eries are contained, are the containers closed and structurally sound, atible with the contents of the battery and lack evidence of leakage, e or damage that could cause leakage? [3745-273-13(A)(1)]	Yes	X	No 📃 N/A				
5.	Are th	e casings of the batteries breached, not intact, or open (except to e the electrolyte)? [3745-273-13(A)]	Yes		No ⊠ N/A				
6.	detern	electrolyte is removed or other wastes generated, has it been nined whether the electrolyte or other wastes exhibit a characteristic ardous waste? [3745-273-13(A)(3)]	Yes		No 🗌 N/A	Ħ			
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes		No □ N/A	X			
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes		No □ N/A	×			
7.	"Unive	e batteries or containers of batteries labeled with the words ersal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" -273-14(A)]	Yes	义	No □ N/A				
UNIVE	RSAL	WASTE LAMPS							
8.	structi conter evider	the SQUWH contain lamps in containers or packages that are urally sound, adequate to prevent breakage, and compatible with of the lamps? Are containers or packages closed and do they lack use of leakage, spillage or damage that could cause leakage? [3745-3(D)(1)]	Yes	×	No 🗔 N/A				
9.	273-13(D)(1)] Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]								
for su waste Crush	i ch act rules (ed lam using	ment (such as crushing) by a UWH is prohibited under this rule un ivities [3745-273-31(B)]. A generator crushing lamps must manage law OAC Chapter 3745-52). Lamp crushing is a form of generator treatmen ps must be transported by a registered hazardous waste transporter to a hazardous waste manifest.	mps ac t (OAC	ccord crule	ing to hazardoı 3745-52-34).	IS			
10.		e lamps or containers or packages of lamps labeled with the words ersal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745- 4(E)]	Yes	<u>`</u>	No □ N/A				
ACCL	JMULA	TION TIME							
11.	Is the	waste accumulated for less than one year? [3745-273-15(A)]	Yes	X	No □ N/A				
	а.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the	Yes		No 🗀 N/A	X			
				. 1116	Not a second contract of the second contract	D-1-			

[Facility Name/Inspection Date] [ID number] SQUWH-B&L/May 2012 Page 1 of 2

	handler to demonstrate) [3745-273-15(B)]		-		1
NOT	E: Accumulation is defined as date generated or date received from another ha	andler.			
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)]	Yes	X	No 🔲 N/A	
	If yes, describe below:				
	START DATES AND MANNIFEST FOR PREVIOUS SHIFTMEN	1			
					ä
EMPI	OYEE TRAINING				
13.	Are employees who handle or have the responsibility for managing	Yes	V	No 🔲 N/A	П
	universal waste informed of waste handling/emergency procedures, relative		7	SELER GERMANER Secretarion	_
	to their responsibilities? [3745-273-16]	<u> </u>			
	PONSE TO RELEASES			tachenaraja kuntaa	
14.	Are releases of universal waste and other residues immediately contained?	Yes		No 🔲 N/A	\mathbf{A}
15	1110000000	L		de siele des carries Statistica de la carrier	
15.	Is the material released characterized? [3745-273-17(B)]	Yes	ᆜ.	No 🔲 N/A	<u> </u>
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the	Yes		No II N/A	X
	handler is considered the generator of the waste and is subject to OAC			Sarahbi	_
	Chapter 3745-52) [3745-273-17(B)]				
OFF-	SITE SHIPMENTS	1			
NOTE	E: If a SQUWH self-transports waste, then the handler must comply with the U	niversa	al Wa	ste transporter	
	ements.				
17.	Are universal wastes sent to either another handler, destination facility or	Yes	X	No 🔲 N/A	
	foreign destination? [3745-273-18(A)]				
18.	Is the handler aware of DOT requirements for packaging and shipping?	Yes	X.	No 🔲 N/A	
	If no, make aware of 49 CFR 171-180.		•		
19.	Prior to shipping universal waste off-site, does the originating handler	Yes	X	No 🔲 N/A	
	ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]	162	Д	NO EL IVA	
20.	Has the originating handler ever had an off-site shipment rejected by	Yes	П	No 🔯 N/A	
	another handler or destination facility?	1.00		7 TW	
	a. If yes, did the originating handler receive the waste back or agree to	Yes	П	No 🗌 N/A	X
	where the shipment was sent? [3745-273-18(E)(2)]				
21.	If a handler rejects a partial or full load from another handler, does the	Yes		No 🔲 N/A	Ø
	receiving handler contact the originating handler and discuss and do one of				•
	the following: a. Send the waste back to the originating handler or send the shipment	N/			
	to a destination facility (If both the originating and receiving handler	Yes		No 🔲 N/A	13
	agree)? [3745-273-18(F)(2)]				
22.	If the handler received a shipment of hazardous waste that was not a	Yes	П	No 🔲 N/A	V
	universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-		_		\leftarrow
->	18(G)]	<u> </u>			
EXPO					
NOTE	E: Small quantity handlers that export waste to the countries listed in 40 CFR 2	62.58(a)(1)	are subject to 4	10
in An i	262 subpart H. Small quantity handlers that export waste to a foreign destination CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4)	OING חכ (1976)	er thai	n the countries	IISTED
	0 CFR 262 subpart E. [3745-273-20]	, (a)(0)	, and	(D), 40 OFR 20	JZ. J/,
	: Violations regarding exporting universal waste to foreign destinations should	be ref	erred	to U.S. FPAR	egion
	ause the federal counterpart provisions are not delegable to states.		.	22 2.3. 27 7170	- 3.0.7

town 16	* - E	USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION	ON PO	INTS				
NOTE	E. A fac	ility is subject to the federal SPCC regulations (40 CFR 112) if it is non-train	nsporta	ation	relate	d (e.g.,	fixed)	and
has a	n aggre	egate above ground storage capacity greater than 1,320 gallons or a total t	underg	round	l stora	age cap	acity	
great	er than	42,000 gallons of oil (including used oil), and there is reasonable expectat	ion of a	a disc	harge	e to nav	igable	
water		200					0.5	
	HIBITIC				M	A NI	A []	
1.	Does to	the generator manage used oil in a surface impoundment or waste pile?	Yes		No	⊠ N/.	А Ц	
*	а.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes		No	□ N/.	A 💢	-
NOT	E: For e	example, used oil contaminated scrap metal stored in a pile.				-		
2:	Is use	d oil used as a dust suppressant? [3745-279-12(B)]	Yes		No	X N/.	A 🗆	
3.		specification used oil fuel burned for energy recovery in devices specified 5-279-12(C)?	Yes		No	□ N/	А <u>Ж</u>	
NOT	E: Multi	ple used oil checklists may be applicable if used oil handler is performing r	nultiple	task t	s (e.g	g., If gei	neratin	g
used	oil and	shipping directly to a burner, complete generator and marketer checklists	at a mi	nimu	m).			A STREET
_	ERATO	R STANDARDS						
4.	Does	the generator mix hazardous waste with used oil? If so,	Yes		No	DX N/	A 🗆	#
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes		No	. 🔲 N/	A D	
NOT	F: Use	d Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-	51-20	to 37	45-51	-24) ha	zardou	IS
waste	e are si	ibject to regulation as a hazardous waste, unless the listed hazardous was	ste is lis	sted s	olely	becaus	e it	
exhib	oits a ha	nzardous characteristic, and the resultant mixtures do not exhibit a character	eristic.	Mixt	ures (of used	oil and	d
	QG haz	ardous waste are subject to OAC Chapter 3745-279.			electronics	1911		
5.	Does	the generator of a used oil containing greater than 1,000 ppm total	Yes		No	□ N/	A 🔀	
	halogens manage the used oil as a hazardous waste unless the presumption							
NOT	is rebi	utted successfully? [3745-279-21(B)]	ha liste	nd ha	zardo	Was Was	to unt	il the
presi	E. II us imption	ed oil contains greater than 1000 ppm total halogens, it is presumed to a successfully rebutted.	CIVIND'S	T PAL	N TOP C	For	EMPTI	ING FILTER
6.	Does	the generator store used oil in tanks; or containers; or a unit(s) subject to	Yes	(M)	No	₩ N/	Α [
	regula	tion as a hazardous waste management unit? [3745-279-22(A)]		S				s.) 92
7.		ontainers and aboveground tanks used to store used oil in good condition	Yes	M	No	□ N	A \square	
-		o visible leaks? [3745-279-22(B)]		-		Bu		
8.	Are co	ontainers, above ground tanks, and fill pipes used for underground tanks y labeled or marked "Used Oil?" [3745-279-22(C)] Pallet and coolant	Yes	*	No	(M) N/	A	
9.		ne generator, upon detection of a release of used oil, done the following:	Yes		No	□ N	Α 🗓	l
	[3745	-279-22(D)]	- X					
	a.	Stopped the release?	Yes		No.	□ N	A 🗵	
	b.	Contained the release?	Yes		No	□ N	Α 🕽	
	124-255							
	C.	Cleaned up and properly managed the used oil and other materials?	Yes		No	□ N	Α 🔯	
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes		No	∏ N	A X]
ON-S	SITE RI	URNING IN SPACE HEATER			as trapped and the			
10.		the generator burn used oil in used-oil fired space heaters? [3745-279-						-
10.7	23] If	so:				120		40
1077	a.	Does the heater burn only used oil that owner/operator generates or	Yes		No	* N	AZ] .
		used oil received from household do-it-yourself (DIY) used oil		2			6	

	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes		No □ N/A	X	
	C.	Are the combustion gases from heater vented to the ambient air?	Yes		No 🗌 N/A	X	
NOT	E: Ash	accumulated in a space heater must be managed in accordance with 374	5-279-	10(E)).		
		R TRANSPORTATION					
11.	obtain	the generator have the used oil hauled only by transporters that have ed a U.S. EPA ID#? [3745-279-24]	Yes	X	No. □ N/A		
12.	If the g	generator self-transports used oil to an approved collection site or to an gation point owned by the generator: [3745-279-24]					
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes		No 🔲 N/A	M	
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes			Á	
NOT	E: Used	d oil generators may arrange for used oil to be transported by a transpo	rter wii	thout	a U.S. EPA ID	# if the	
used	oil is re	claimed under a contractual agreement (i.e., tolling arrangement).					
COL		N CENTERS AND AGGREGATION POINTS					
13.	standa	DIY used oil collection center in compliance with the generator ards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes		No 🗌 N/A	Ř	
14.	Is the 31]	non-DIY used oil collection center registered with Ohio EPA? [3745-279-	Yes		No 🔲 N/A	X	
15.	3745-2	used oil aggregation point in compliance with the generator standards in 279-20 to 3745-279-24? [3745-279-32]	Yes		No □ N/A	X	
NOTI used	NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.						

Appendix C

Documents received during the Inspection:

- Training syllabus and records
- Contingency Plan (sans attachments)
- Manifests for Tank 5 cleanout
- Manifest examples of partial and full load rejections
- Weekly inspection record example for 90-day pad dated 12/3/13
- Profile for wastewater treatment filter press solids
- Blank truck tracking form

Inspection Date:

December 11, 2013

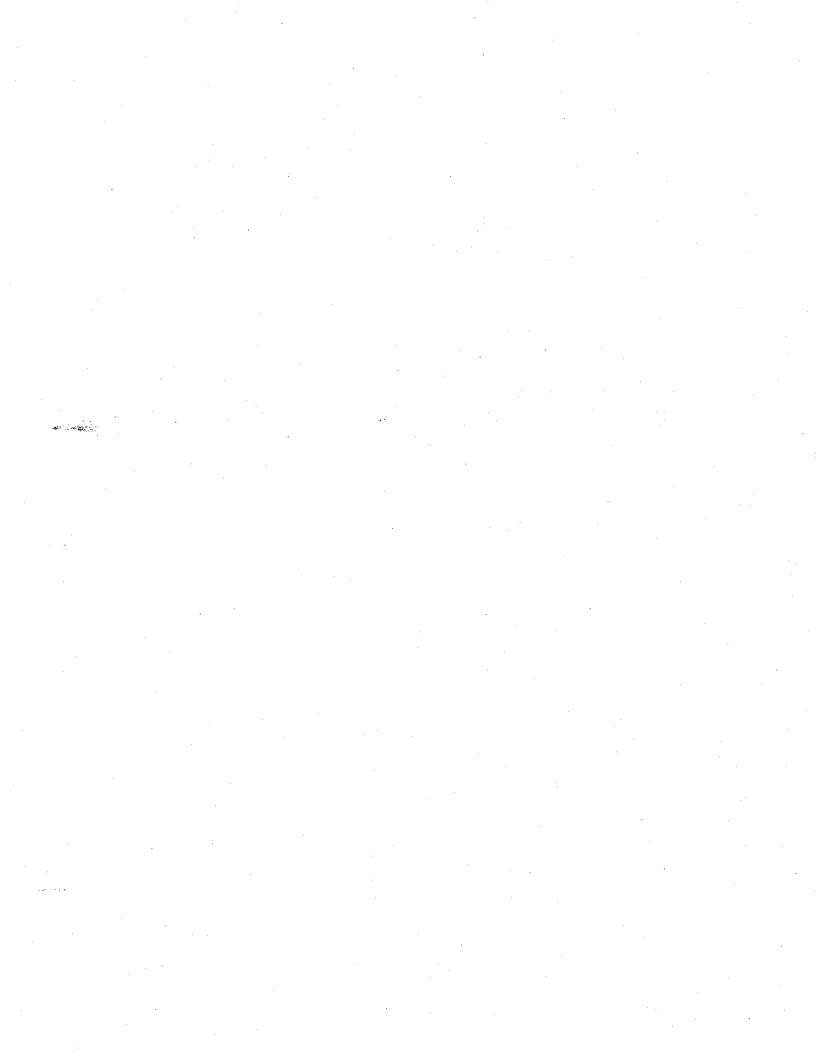
Facility Name and ID Number:

CHESI - WTP

EPA ID: OHD000724153

CHESI - TF

EPA ID: MAD039322250



TRAINING SYLLABUS
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RELORDS

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- 1. Introduction
- 2. Regulation Overview
 - a. RCRA History
 - b. RCRA Subtitles
 - c. Goals of RCRA
 - d. Hazardous Waste Regulations
 - i. Federal Register
 - ii. Code of Federal Regulations (CFR)
 - 1. Parts 260-265, 268 &273
 - iii. Universal Waste
- 3. Identifying Hazardous Waste
 - a. Definition
 - b. Exclusions
 - c. Listed Hazardous Waste
 - i. "F" List Wastes from non-specific sources
 - ii. "K" List Wastes from specific sources
 - iii. "U" List Wastes which were never used
 - iv. "P" List Acutely Hazardous Waste
 - d. Characteristics of Hazardous Waste
 - i. D001 Ignitable
 - ii. D002 -Corrosive
 - iii. D003 Reactive
 - iv. D004-D043 Toxic
- 4. Generator Status & Requirements
 - a. Generator Classifications
 - b. Quantity Limitations
 - i. CESOG
 - ii. SOG
 - iii. LOG
 - iv. TSDF
 - c. Generator Requirements
- 5. Accumulating and Storing Hazardous Waste
 - a. Container Selection
 - i. Transportable
 - ii. Tamks
 - b. Satellite Accumulation
 - c. Satellite Container Marking
 - d. Drum Transportation Requirements
 - e. Storage Areas
 - f. Hazardous Waste Markings for Transportation
 - g. Segregating Incompatible Hazardous Waste
 - h. Potentially Incompatible Wastes
- 5. Manifesting & Land-Ban Restrictions
 - a. Hazardous Waste Manifest
 - i. General Info

Training Outline
RCRA/Confingency (flo)
Cleveland Facility
2 3.54

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- ii. Filling Out the Manifest
- iii. Routing of Manifest Copies
- iv. Record Keeping and Reporting
- b. Land Disposal Restrictions (LDR)
 - i. Overview
 - ii. Determining if a Waste is Restricted from Land Disposal

 - iv. Appendices
- 7. Waste Minimization
 - a. Source Reduction
 - b. Approaches and Techniques
 - c. Incentives and Benefits
 - d. Examples
- 8. Contingency Planning and Emergency Response
 - a. Content of a Contingency Plan
 - b. Emergency Procedures
 - c. Actions During an Emergency
 - d. Emergency Equipment and Systems
 - e. Resuming Operations
 - f. Documentation and Reports
 - g. Identification of Hazardous Materials
 - i. MSDS
 - ii. NFPA labels
 - iii. HMIS labels
- 9. Cleveland Facility Contingency Plan and Emergency Procedures
 - a. General Info
 - b. Emergency Coordinators*
 - c. Implementation
 - i. Pires/Explosions
 - ii. Spills of Materials Release
 - iii. Floods
 - d. Emergency Response Procedures
 - i. Notification to Federal, State and Local Officials
 - ii. Identification of Hazardous Materials
 - iii. Assessment
 - iv. Control Procedures
 - 1. Fire/Explosion
 - 2. Release to Air, Soil or Surface Water
 - 3. Equipment Frilure or Power Outages
 - v. Prevention of Recurrence or Spread of Fixes, Explosions or Releases
 - vi. Stornge and Treatment of Released Material
 - vii. Incompatible Weste
 - vill. Post Emergency Equipment Asimtemence
 - ix. Container Spills and Leaks

Perining Outline RCRAM anthropout that Caveloud Recility Rap (

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- x. Tank System Spills and Leaks
- e. Emergency Equipment***
- f. Coordination Agreement Requirements**
- g. Evacuation Plan
 - i. Signals
 - ji. Routes
 - iii. Post Evacuation Personnel Verification
- h. Required Reports
- i. Employee Training
- j. Fire Extinguisher Training
- k. Employee Review
- 1. Tables G-1*, G-2**, G-3***
- m. Appendix G-1, Chemical Storage Site Plan
- n. Appendix G-2, Emergency Equipment Key and Evacuation Routes

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Review Session Summary

Course Code:

ET3050

Course Name:

Annual RCRA Training

Session Number:

00010668

Status:

Complete

Start Date:

08/29/2013

End Date:

08/29/2013

Language:

Facility:

Clean Harbors of Cleveland

Session Summary	(Customize Find Vie	w All 🕮 🛗	First 1-6 of 6 Last
Employee ID	Name		Status	Grade
026281	Luz E Marrero		Completed	
1213	Susan J Sevy		Completed	
1912	Alberto A Hernandez	And the second s	Completed	
3368	Oren B Hargrove		Completed	
3731	Michael T Skidmore	AND THE PERSON NAMED IN COLUMN TO SERVICE OF THE PERSON NAMED IN COLUMN TO SER	Completed	
4551	Jose A Castaneda		Completed	

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Review Session Summary

Course Code:

ET3050

Course Name:

Annual RCRA Training

Session Number:

00010682

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Start Date:

09/23/2013

End Date:

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Language:

Facility:

Clean Harbors of Cleveland

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Employee ID	Name	Status	Grade
0046	Dominic E Okon	Completed	
0084	Jaime Cotto	Completed	THE PROPERTY OF THE PROPERTY O
023311	Demarcus G Dues	Completed	, , , , , , , , , , , , , , , , , , ,
6016	Santiago Benavides	Completed	

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Review Session Summary

Course Code:

ET3050

Course Name:

Annual RCRA Training

Session Number:

00010671

Status:

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Start Date:

08/27/2013

End Date:

08/27/2013

Language:

Facility:

Clean Harbors of Cleveland

Session Summary	Customize Find Vie	a Mail Palia wa	First 1-4 of 4 Last
Employee ID	Name	Status	Grade
0085	David M Cicerchi	Completed	
022142	Edward L Riley Sr	Completed	
2913	Frank G Hegarty	Completed	
4583	Jeffrey L Jones	Completed	

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Review Session Summary

Course Code:

ET3050

Course Name:

Annual RCRA Training

Session Number:

00010669

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Start Date:

08/28/2013

End Date:

08/28/2013

Language:

Facility:

Clean Harbors of Cleveland

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Employee ID	Name	Status	Grade
027928	Clifford M Stanley	Completed	994 m
1913	Sylvester F Young	Completed	андоолахин
4281	John D Merth	Completed	
4368	Tracy A Balcer	Completed	
7702	John R Farris	Completed	and the same of th

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CONTINGENCY

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Contingency Plan
And
Emergency Procedures

For:

Clean Harbors Environmental Services, Inc. 2900 Rockefeller Ave. Cleveland, Ohio 44115

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CLEAN HARBORS ENVIRONMENTAL SERVICES, INC.

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

G-1 GENERAL INFORMATION

Clean Harbors Environmental Services, Inc. (CHESI) is a wastewater treatment facility which treats hazardous and non- hazardous aqueous waste. The name, facility address, EPA 10 Number, and owner/operator of the facility is:

Facility Name:

Clean Harbors Environmental Services, Inc.

Facility Address:

2900 Rockefeller Avenue

Cleveland, Ohio 44115

EPA ID Number:

OHD000724153

Owner/Operator:

Clean Harbors Environmental Services, Inc.

2900 Rockefeller Avenue Cleveland, Ohio 44115

CHESI treats aqueous-based waste streams in an onsite waste water treatment system. A site plan for the facility is presented in Appendix G-1.

CHESI has developed this Contingency Plan ("the Plan") in accordance with the requirements of OAC 3745-52-34(A){4}. The purpose of the Plan is to minimize hazards to human health or the environment from fires, explosions, or any unplanned, sudden, or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface waters. The actions described in this Plan must be implemented immediately whenever such releases could threaten human health or the environment. The Plan will be reviewed, and immediately amended, if necessary, whenever:

- * The facility permit is revised;
- The Plan fails in an emergency;
- CHESI implements a design, construction, operational, or maintenance change which materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the nature of the required response;
- The list of Emergency Coordinators changes; or
- The list of emergency equipment changes.

Up-to-date copies of the revised Plan will maintained on file at the facility and distributed to the Emergency Coordinators identified in Section G-2 and all emergency response agencies identified in Section G-6 of the Plan.

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G-2 EMERGENCY COORDINATORS [OAC 3745-65-52 (DI. OAC 3745-65-55]

The CHESI personnel listed in Table G-1 have been designated to act as Emergency Coordinators.

At least one of the Emergency coordinators will, at all times, be either on the facility premises or on call and available to respond to an emergency by reaching the facility within a short period of time. The Emergency Coordinators are responsible for coordinating all emergency response measures. The Emergency Coordinators are thoroughly familiar with all aspects of the Contingency Plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout. In addition, the Emergency Coordinators have the authority to commit the resources needed to carry out the Contingency Plan.

If none of the designated Emergency Coordinators are on the premises, the on duty Supervisor will be responsible for contacting the Emergency Coordinator. The Supervisor will assume the duties of the Emergency Coordinator until such time as one of the designated Emergency Coordinator has arrived at the scene.

G-3 IMPLEMENTATION [OAC 3745-65-56]

The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. This Contingency Plan will be implemented in the following instances:

1. Fire and/or Explosion:

- a) A fire which could cause the release of toxic fumes.
- A fire which could spread and ignite materials at other locations onsite or could cause heat induced explosions.
- c) A fire which could possibly spread to offsite areas.
- d) Use of water and/or chemical fire supressant which could result in contaminated run-off.
- e) An explosion which could cause a safety hazard because of flying fragments or shock waves.
- f) An explosion which could ignite other hazardous waste at the facility.

Spills or Material Release:

- al A spill or leak which could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- b) A spill or leak which could cause the release of toxic liquids or fumes.
- c) A spill which could result in onsite soil contamination.

- d) A spill which cannot be contained onsite could result in offsite soil contamination and/or ground or surface water contamination.
- e) A spill which could enter the sewer systems.

Floods:

- a) A flood which could result in surface water contamination.
- A flood which could spread hazardous waste constituents causing onsite and offsite soil and groundwater contamination.
- A flood which could disrupt activities at the facility and endanger health and safety.

G-4 EMERGENCY RESPONSE PROCEDURES

G-4(a) Notification to FederaL State, and Local Officials

m General

Whenever there is an imminent or actual emergency situation, the Emergency Coordinator shall immediately:

- Notify affected facility personnel verbally or by using two way radios;
- 2. Activate internal facility alarms/paging systems, if If necessary, and;
- Contact federal/state/local agencies having designated response roles for assistance, if necessary.

If the Emergency Coordinator's assessment of the situation determines that the facility has experienced, or is likely to experience, a release, fire, or explosion which could threaten public health, safety, or welfare, the environment, or that external emergency response assistance is required, the Emergency Coordinator shall immediately notify the Cleveland Fire and Police Departments, the Ohio EPA Emergency Response Team and Cuyahoga County Emergency Management.

* Cleveland Fire Department:

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Cleveland Police Department: 911

Ohio EPA Emergency Response Team: (216) 621-

* Cuyahoga County Emergency 1234 (800) Management:

282-9378

(216) 771-1365

The Cleveland Fire Department shall function at the primary response agency in all emergency situations. The Emergency Coordinator shall be available to assist the Cleveland Fire Department and other state/local officials in deciding whether local areas should be evacuated.

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- The reporting requirements for spills, leaks, and/or releases at the facility are governed by two separate regulatory programs:
 - 1. CERCLA National Contingency Plan 140 CFR 300)
 - 2. SARA Emergency Planning and Notification (40 CFR 355).

In accordance with the terms of the National Contingency Plan (NCP), 40 CFR Part 302, CHESI will notify USEPA and Ohio EPA and undertake appropriate response actions to any reportable release or threat of release of oil or hazardous materials to the environment.

A release shall be considered "reportable", and the Contingency Plan shall be enacted, if the amount of the release exceeds the Reportable Quantity {RQ} for that material as listed in Table 302.4, List of Hazardous Substances and Reportable Quantities (40 CFR Part 302). A "reportable" release will be reported to the Ohio EPA and the USEPA National Response Center (NRC) as soon as possible, but not more than twenty-four (24) hours after obtaining knowledge of a release or threat of a release. The release shall also be reported to the Cleveland Fire Department, and the Ohio EPA Emergency Response Team:

USEPA National Response Center:

1800) 424-8802

Notification under SARA regulations is required when: 1) a CERCLA "hazardous substance" [40 CFR Part 302, Table 302.4] or a SARA "extremely hazardous substance" [40 CFR Part 355, Appendix A] is released in an amount in excess of the RQ; AND 2) when the release threatens the environment or public beyond the boundaries of the site. For any release which is reportable under SARA, a verbal notification will be made to the State Emergency Response Commission (SERC) and the Local Emergency Response Planning Commission (LERPC) in addition to the USEPA National Response Center. The Ohio EPA serves as the SERC; the Cuyahoga County Emergency Management functions as the LEPC.

(ii) Content of Notification

In general, when notifying external emergency response authorities, the caller shall provide the following information to the extent known at the time of the report:

The name and telephone number of the individual making the report

- The name and address of the facility;
- The time, type (e.g., release, fire), and duration of the incident/release;
- The chemical name(s) and quantity of material(s) involved;
- The extent of injuries, of any;

The potential hazards to public health, safety, or welfare, or the environment outside the facility.

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In addition, if the release is being reported in accordance with SARA requirements, the following information is to also be provided to the extent known at the time of the report:

- Any known or anticipated acute or chronic health risks associated with the emergency, and, where appropriate, advice regarding medical attention necessary for exposed individuals;
- Proper precautions to take as a result of the release, including evacuation; and
- The names and telephone number of the person or persons to be contacted for further information

Within fifteen {15) days of any release requiring the implementation of the Plan, CHESI shall submit to Ohio EPA a written follow-up report that will include:

- 1. The name, address, and telephone number of the owner or operator;
- 2. The name, address, and telephone number of the facility;
- 3. The date, time, and type of incident (e.g., fire, explosion);
- 4. The name and quantity of material(s) involved;
- 5. The extent of injuries, if any;
- 6. An assessment of actual or potential hazards to public health, safety, welfare, or the environment, as applicable;
- 7. The estimated quantity and the disposition of recovered material that resulted from the incident;
- 8. Proposed measures to prevent similar incidents in the future.
- 9. Any additional information as the OEPA may require.

For release incidents reported under SARA, CHESI shall, as soon as practicable after the release (but no more than fifteen [15] days later), submit a written follow-up report to the LEPC and SERC. The report shall include items 1 through 9 above, and:

- 10. A description of the actions taken to respond to and contain the release;
- 11. Any known or anticipated acute or chronic health risks associated with the release;
- 12. Where appropriate, advice regarding medical attention necessary for exposed individuals.

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G-4b Identification of Hazardous Materials

Whenever there is a release, fire, or explosion, the Emergency Coordinator will immediately take all appropriate steps to identify the character, source, amount, and extent of any released material. The determination may be made by visual observation, discussions with other CHESI personnel, a review of facility records and/or manifests, or by chemical analysis.

G-4c Assessment

The Emergency Coordinator is responsible for assessing any possible hazards to human health or the environment which may result from the release, fire or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, the effects of any hazardous surface water run-offs from chemical agents and/or water used to control fire or heat-induced explosions).

In assessing the toxic or hazardous nature of the material(s) involved in the incident, the Emergency Coordinator may rely on operational experience and/or technical information provided by Material Safety Data Sheets {MSDS's}, manufacturer's literature, or standard reference books such as CRC handbooks or the NIOSH Pocket Guide to Chemical Hazards. The Clean Harbors Corporate Health and Safety staff is also available for consultation on a 24-hour basis. A general description of the anticipated hazards from the waste material and raw treatment chemicals stored/used at the facility is presented in Appendix G-1.

G-4d Control Procedures

Any employee who observes, discovers or otherwise detects an emergency situation involving fire, explosion or release is to follow the general emergency response procedures:

- 1. Immediately notify the Emergency Coordinator.
- Alert other personnel in adjacent areas to potential hazards.
- 3. Render assistance to personnel that may be involved in the emergency and remove them from further exposure or injury.
- 4. The Emergency Coordinator will, depending on the magnitude of the situation, call for local emergency assistance.
- 5. If evacuation of the facility is required, all plant operation::; are to immediately cease. All personnel are to quickly and calmly exit their workplaces, evacuate the facility via the prescribed evacuation routes, and assemble in the pre-designated emergency assembly area outside the main entrance to the facility.

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6. Facility personnel should only attempt to handle fires or other emergencies in their early stages (i.e., incipient stage) Under no circumstance, however, should any employee attempt to handle and emergency situation alone.

G-4d(1) Fire and/or Explosion

In the event of a tire or explosion, the following response procedures shall be followed:

- 1. The individual discovering the fire is to immediately contact the Emergency Coordinator.
- Area personnel may attempt to contain small fires using the portable fire extinguishers located throughout the facility without taking undue risk of personal injury. Facility personnel should only attempt to handle fires in their early or incipient stages.
- 3. If outside fire fighting assistance is required, the Emergency Coordinator shall immediately notify the Cleveland Fire Department.

G-4 (2) Release to Air, Soil, or Surface Water

In the event of a release of hazardous waste to the air, soil or surface water (other than from a fi1-e or explosion) the following procedures shall be followed:

- The individual discovering the release is to immediately contact the Emergency Coordinator.
- 2. Area personnel shall attempt to contain the release without taking undue risk of personal injury.
- The Emergency Coordinator shall direct all spill cleanup/ containment actions.
- Absorbent material (i.e., Speedi-Dri) is available in the facility for use in containing and cleaning up spills.
- 5. All contaminated material (i.e., spill debris, spent absorbents, etc.) shall be removed and deposited into drums or bulk roll-off containers for disposal at an approved offsite disposal facility.
- 6. Large-quantity liquid spills shall be collected using portable pumps or vacuum tankers at the direction of the Emergency Coordinator. Special precautions shall be taken to ensure that collected liquids are compatible with pumping equipment and will not cause any adverse reactions. Collected liquids will be pumped into the bulk transport vehicles. Collected solids will be drummed or placed in a roll-off container for disposal at an approved offsite facility.

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G-4d(3) Equipment Failure or Power Outages

The procedures to be followed in the event of an equipment failure or a facility-wide power outage include:

- 1. Immediate shut-down of all related operations;
- 2. Replace or repair affected equipment;
- 3. Re-start of equipment/operations only at the direction of the Emergency Coordinator.

Note that operations which are not affected by a power outage may continue to operate at ttle discretion of the Emergency Coordinator.

G-4e Prevention of Recurrence of Spread of Fires, Explosions or Releases

During an emergency, the Emergency Coordinator will take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread to other areas of the facility. These measures include where applicable: stopping material transfer operations; containing and collecting released wastes and contaminated run-off streams; and removing or isolating containers.

If the facility halts operations in response to a fire, explosion or release, the Emergency Coordinator shall monitor for leaks, pressure build-ups, or ruptures in valves, pipes, or other equipment.

G-4f Storage and Treatment of Released Material

Immediately after an emergency, the Emergency Coordinator must provide for the treatment, storage, or disposal of recovered waste, contaminated soil, surface water, or any other material that results from a release, fire, or explosion at the facility. CHESI will manage all recovered material as hazardous waste unless analytical results indicate otherwise, and will assume the responsibilities of being the waste generator for all materials shipped offsite for treatment and/or disposal.

G 4g Incompatible Waste

No waste which may be incompatible with the released material is to be treated, stored, or disposed of until cleanup procedures are completed and waste compatibility has been determined according to in-house waste codes and verified by sampling and analysis protocol in the facility's Waste Analysis Plan {WAPI.

G-4h Post Emergency Equipment Maintenance

Immediately following an emergency at the facility, the Emergency Coordinator will provide for tile decontamination and/or replacement of all emergency equipment utilized during the response. All emergency equipment listed in the Contingency Plan shall be inspected, cleaned, and maintenance performed before normal operations are resumed.

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G·4i Container Spills and Leaks

In the event of leak or spill involving containers, the following response measures shall be taken:

- 1. If a container is found to be leaking, the contents of the container shall be immediately transferred to another compatible container, or the leaking container shall be placed into an approved salvage or over-pack drum.
- 2. Spilled or leaking waste shall be collected and removed using absorbents or other means such as shovels, brooms, pumps, etc. All collected materials and spill residues shall be containerized and managed as a hazardous waste unless analytical results indicate otherwise.
- 3. In the event that a container inside a lab pack is cracked or broken, the container shall be removed from the lab pack and re-packed. Any packing material which becomes contaminated as the result of a cracked/leaking container shall be containerized and managed as a hazardous waste unless analytical results indicate otherwise. Any other container inside the lab pack which becomes contaminated by the spilled material will be decontaminated (i.e., wiped off) and placed into another compatible lab pack.

G-4j Tank System Spills and Leaks

G-4j(1) Tank System Spills and Leakage

In the event of leak or spill involving the tanks or containment systems at the facility, the following response measures shall be taken:

- 1. The flow of liquid into the tank system will be immediately halted by shutting down the pumping system. If necessary, the waste liquids in the leaking tank will be pumped into an alternative tank to prevent further flow.
- 2. Within 24 hours of detecting a leak in a tank system, CHESI will remove as much of the waste as is necessary to prevent further release of waste and to allow inspection and repair of the tank system to be performed.
- 3. Any material released into a tank containment system will, within 24 hours of the release and to the extent practicable, be pumped back into an alternative tank. Absorbent materials will be available to pick up non-pumpable waste or residue.
- 4. Any tank failure or release from a tank or containment system which results in a release of hazardous waste into the environment will be verbally reported to the Agency within twenty-four (24) hours. A written follow-up report will be submitted to the Agency within fifteen (15) days of the detection of the release or leak.

5. All tank repair activities shall comply with the repair requirements of the CHESI Consent Decree. Major repairs will be certified as complete by an OH registered professional engineer (PE).

G-5 EMERGENCY EQUIPMENT [724.152(e)]

A list of the emergency and safety equipment maintained at the facility, as well as a site map showing the locations of each piece of emergency equipment is presented in:

Appendix G-2: Clean Harbors Environmental Services, Inc., Emergency & Safety Equipment Location Plan.

The capabilities of the emergency equipment available onsite are summarized in Table G-3.

In addition to the equipment described in Appendix G-2, the General Manager, Laboratory Manager, Operations Manager, and each Plant Operator or Maintenance personnel is equipped with or has access to the following safety equipment:

- 1 pair of safety glasses with sideshields
- 1 pair of chemical goggles
- 1 cartridge respirator
 - 1 pair of combination cartridges (dusts/acid gas/org. vapors)
 - chemical splash suits (i.e., coated Tyveks, etc.)
 - 5 sets of work uniforms
 - 1 hard-hat w/safety shield
 - PVC gloves
 - rubber boots

All CHESI laboratory personnel are equipped with the following personal safety equipment:

1 pair safety glasses with sideshields 1 cartridge respirator laboratory coats

Additionally disposable plastic (nitrile) gloves and hard hats are available in the laboratory for common use.

G-6 COORDINATION AGREEMENT REQUIREMENTS [OAC 3745-65-521Cil

In accordance with OAC 3745-65-52(C), CHESI will distribute copies of this Contingency Plan to the emergency response organizations noted in Table G-2. In addition, CHESI will, as changes in the Plan warrant, sponsor informational meetings at the facility to provide the agencies with the opportunity to tour the facility a11d discuss emergency response procedures.

Copies of all correspondence related to emergency response coordination agreements between CHESI and the above-noted agencies will be maintained on file at the facility. CHESI will document the refusal of any of these agencies to participate in the emergency response coordination effort.

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G-7. EVACUATION PLAN

G-7a. Evacuation Plan

The Emergency Coordinator is the sole CHESI representative who has the authority to direct personnel to evacuate the facility. Note that the use of the emergency alarm system requires employees to exit their workplace immediately after stopping all plant functions whose continued operation would threaten safety in and around the facility. Employees responsible for stopping plant functions are as follows:

- 1. Reactor operators must stop all chemical additions.
- Truck pad operators must stop all pumps on the truck pad and close all truck external valves.
- 3. CTU operator must shut off treatment.
- 4. Filter press operator must stop sludge feed pump into filter press, and stop sludge addition into any tank being filled (ARs and sludge feed tanks).

Employees must then proceed directly to the emergency assembly point outside the main entrance gate to the facility. Employees not responsible for stopping the above functions must proceed immediately to the main entrance gate to the facility.

G7b. Evacuation Signal(s)

The Emergency Coordinator will issue a verbal command or sound the internal fire alarm to notify facility personnel of the decision to evacuate. Prior to evacuation, the supervisors must account for all personnel from their respective work areas. Supervisors are trained and will assist with the evacuation of plant personnel. No plant personnel will remain behind to operate critical plant functions.

G7c. Evacuation Routes

Primary evacuation routes from each of the operational and support areas are shown in the "Emergency Evacuation Plan" presented in Appendix G 2. After exiting the workplace, personnel will assemble outside the main facility entrance to await further instructions from the Emergency Coordinator. An annual evacuation drill is performed to ensure personnel are familiar with the evacuation route in the event of an authentic emergency.

G-7d. Post Evacuation Personnel Verification

The Emergency Coordinator will account for all personnel after evacuation. A head count will be performed by the Emergency Coordinator after evacuation.

G-8. REQUIRED REPORTS

The Emergency Coordinator will document in the facility's operating record the time, date and details of any incident that requires notification to any external emergency response agency.

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Within fifteen {15} days after any such incident, a written report of the incident will be submitted to the Ohio EPA. The report will include the information described previously in Section GA(a)(ii). Operations following an emergency will not resume without the approval of the Emergency Coordinator.

G-9. EMPLOYEE TRAINING

Employees are required to review this plan at the time of its development, whenever the plan is changed, or when employee responsibilities or designated actions under the plan change. All employees must review the plan at time of hire and at least annually thereafter. Employees desiring clarification of the plan or their role in the plan will contact the Emergency Coordinators listed in Table G-1.

G-10. FIRE EXTINGUISHER TRAINING

All employees, with the exception of administrative and clerical staff, will be trained in the use of portable fire extinguishers for use in fighting incipient stage fires. This training will be done at initial hire and annually thereafter.

G-11. EMPIOYEE REVIEW

This plan is available at all times for employee review in the Compliance Manager's Office.

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MANIFECTS FOR
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MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

1.LB-CLLXEB

and provincial transport and environmental legislation.

fédérale et provinciale sur l'environnement et le transport.

Ce document de mouvement/manifeste est conforme aux législations

RT04342-2-3

RT04342-2

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifeste

9C PPW 8/6/2013 CL8042380

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Land Disposal Restriction **Notification Form**

Page: 1 of 2

Printed Date :Sep 24, 2013

MANIFEST INFORMATION Manifest Tracking Info. Generator: Clean Harbors Env Services Inc. 2900 Rockefeller Avenue Address: Cleveland,OH 44115 Sales Order No: CL8042380 EPA ID #: OHD000724153 LINE ITEM INFORMATION LDR Disposal Category Treatability Group: Line Item: Page No: Profile No: NON-WASTEWATER 2 (This is subject to LDR.) 1. LB-CLLXEB **EPA Waste SubCategory EPA Waste Code** Toxicity Characteristic for Arsenic D004 Toxicity Characteristic for Barium D005 Toxicity characteristic for Cadmium D006 Toxicity Characteristic for Chromium D007 **Toxicity Characteristic for Lead** D008 Low Mercury, not RMERC Residues D009 Toxicity Characteristic for Selenium D010 Toxicity Characteristic for Silver D011 Light Ends Subcategory F025 Hydrated Subcategory K006 Low Lead Subcategory K069 Non-wastewaters, not residues from RMERC K071 Non-wastewater, Low Merucry, not residues from RMERI K106 4,6-dinitro-o-cresol salts P047 Non-wastewaters, not incinerator or RMERC residues P065 Non-wastewater, not incinerator residue or RMERC P092 residue Low Mercury, non-wastewater not RMERC residues

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Land Disposal Restriction Notification Form

Page: 2 of 2

Printed Date: Sep 24, 2013

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Certification	Applies to Manifest Line Items
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.	1.
Waste analysis data, where available, is attached. Signature: Run Enaver Print Name Ut E Marve Title: Complaine Grand Date: 912413	200

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Page:1 of 4

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MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

RT04344-8

This Movement document/manifest policinis to all indensitions or provincial transport and environmental lightistation.

Ce document de mouvement/manifests est conforme aux législations fédérale et provinciale sur l'environnement et le transport.

RT04344-8-3

Movement Document / Manifest Reference No.

N° de référence du document de mouvement/manifeste

SC PEN 8/6/2013

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Page: 1 of 2

Printed Date: Sep 25, 2013

MANIFEST INFORMATION Manifest Tracking Info. Generator: Clean Harbors Env Services Inc 3 SUPPLATE 2900 Rockefeller Avenue Address: Cleveland OH 44115 Sales Order No: CL8058326 EPA ID #: OHD000724153 LINE ITEM INFORMATION Line Item: Page No: Profile No: Treatability Group: LDR Disposal Category LB-CLLXEB 2 (This is subject to LDR.) NON-WASTEWATER EPA Waste SubCategory **EPA Waste Code** D004 Toxicity Characteristic for Arsenic D005 Toxicity Characteristic for Barium D006 Toxicity characteristic for Cadmium D007 **Toxicity Characteristic for Chromium** B000 Toxicity Characteristic for Lead D009 Low Mercury, not RMERC Residues D010 Toxicity Characteristic for Selenium D011 Toxicity Characteristic for Silver F025 Light Ends Subcategory K006 Hydrated Subcategory K069 Low Lead Subcategory K071 Non-wastewaters, not residues from RMERC K106 Non-wastewater, Low Merucry, not residues from RMERI P047 4.6-dinitro-o-cresol salts P065 Non-wastewaters, not incinerator or RMERC residues P092 Non-wastewater, not incinerator residue or RMERC residue U151 Low Mercury, non-wastewater not RMERC residues

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Page: 2 of 2

Printed Date: Sep 25, 2013

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MOVEMENT DOCUMENT / MANIFEST DOCUMENT DE MOUVEMENT / MANIFESTE

Ce document de mouvementmanifeste est conforme aux législations :

This Movement document/manifest conforms to all tederal and provincial transport and environmental legislation.

lédérale et provinciale sur l'environnement et le transport.

CL8347094 BOX VB21342

LP46410-4

Movement Document / Manifest Reference No.
N° de référence du document de mouvement/manifest

SC PRW 8/6/2013 CL4347084

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Page: 1 of 2

Printed Date :Oct 30, 2013

MANIFEST INFORMATION Generator: Clean Harbors Env Services Inc. Manifest Tracking Info. 2900 Rockefeller Avenue 00 4768342 FLE Address: Cleveland, OH 44115 EPA ID#: OHD000724153 Sales Order No: CL8347094 LINE ITEM INFORMATION Line Item: Page No: Profile No: Treatability Group: LDR Disposal Category LB-CLLXEBB NON-WASTEWATER 2 (This is subject to LDR.) **EPA Waste Code EPA Waste SubCategory** D004 **Toxicity Characteristic for Arsenic** D005 Toxicity Characteristic for Barium D006 Toxicity characteristic for Cadmium D007 Toxicity Characteristic for Chromium D008 Toxicity Characteristic for Lead D009 Low Mercury, not RMERC Residues D010 Toxicity Characteristic for Selenium D011 Toxicity Characteristic for Silver F025 Light Ends Subcategory K006 Anhydrous Subcategory K069 Low Lead Subcategory K071 Non-wastewaters, not residues from RMERC K106 Non-wastewater, Low Merucry, not residues from RMER P047 4,6-dinitro-o-cresol P065 Non-wastewaters, not incinerator or RMERC residues P092 Non-wastewater, not incinerator residue or RMERC residue U151 Low Mercury, non-wastewater not RMERC residues

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Page: 2 of 2

Printed Date :Oct 30, 2013

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Certification	Applies to Manifest Line Items
Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.	1.
Waste analysis data, where available, is attached. Signature: Configurate Guard Date: 4313	9.1.2

MANIFEST EXAMPLES
OF PARTIAL AND FULL
LOAD REJECTIONS
MANIFEST # 006745647FLE
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15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of the	is consignment are fully e	nd accurately des	cribed above	by the proper shi	pping name	and are class		
marked and labeled/placarded, and are in all respects in proper condition for transport ac Exporter, I certify that the contents of this consignment conform to the terms of the attach I certify marke waste minimization statement identified in 40 CFR 262-27(a) (if I am a ten	ed EPA Acknowledgment	of Consent.	•	•	ii avhoir pi	ihisk an ia	i site e i i i i i i i	"
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EPA Form 8700-22 (Rev. 3-05) Previous aditions are obsolete.			2 P	ICILITY TO E	S	<i>Df</i> Tion state	120	1 /シー

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DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

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5. Gene	erator's Name and Medi	ng Address		Ч,	Gerwini	itor'a Site Address	(it chierent ti	an mailing address	1			
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Genera	ator's Phone: (570) sporter 1 Company Na	2RR-0623						U.S. EPA ID N				
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19. Hazardous Weste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) H070

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EPA Form 8700-22 (Rev. 8-05)

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in them 18a
Printed/Typed Name
Stagastre

CleanHarbors ENVIRONMENTAL SERVICES

Land Disposal Restriction Notification Form

Page: 1 of 1

Printed Date :Jul 12, 2013

ENVIRONMENTAL	SERVICES"			.coroczczeki		
MANIFEST INFOR	MATION				*********	
Generator:	General Elect	ric Company	į		Manifest Tracking In	fo
Address:	207 N Thoma Sayre,PA 188	s Avenue PO Box 840	250		006615347FLE	
EPA ID #:	PAD0820	38480	<u> </u>	Sale	es Order No: D37393638	3
LINE ITEM INFOR	RMATION			~, ~, ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~		
Line Item: Pa	ige No:	Profile No:	Treatability Group:		LDR Disposal Category	
1. 1		CH70008-1	WASTEWATER		2 (This is subject to LDR	.)
EPA Waste Code		Ĺ	A	EPA Wa	ste SubCategory	
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		Certif	fication			Applies to Manifest Line Items
Pursuant to 40 CFI Part 268.	R 268.7(a), I he	ereby notify that this	s shipment contains	waste res	tricted under 40 CFR	1.
This waste is not re	estricted as spe	ecified in 40 CFR 20	68 Subpart D.			2.
Waste analysis da Signature : Title :	- Soch	able, is attached. www.T-/Lub www.	وے Print Name Date :	e	Andrew Ka 7-15-13	bes

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lease print or type. (Form designed for use on elite (12-plich) typewriter.) UNIFORM HAZARDOUS WASTE MANIFEST 21. Generator ID Number	22. Pagé	23. Manifest	LIZ 2	เ็มๆ .	FLK
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25. Transporter 3 Company Name Em. Struis Jan			U.S. EPA ID I	Number	9322 also
26. TransporterCompany Name	WHE WERL	1126	11/4	pos	9322250
27a. 27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number,	28. Contain	ners	29. Total	30. Unli	31, Waste Codes
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32. Special Handling Instructions and Additional Information					
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34, Transporter Acknowledgment of Receipt of Materials					Month Day Year
Printed/Typed Name Sk	gnature				
35. Discrepancy					<u> </u>
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36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, dispos-	al, and recycling systems)			
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32. Special Handling Instructions and Additional Information		<u> </u>	
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34. Transporter Acknowledgment of Receipt of Materials			
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_ F SS. Discrepancy			
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36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment	t, disposal, and recycling systems)		
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25. Transporter			U.S, EPA ID M.A. I	Number 0 3 9 3	322250			
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n 8700-22A (Rev. 3-05) Previous editions are obsolete. ean Harbors has the appropriate permits for and will accept the was	DE	SIGNATED F	ACILITY TO	DESTINAT	ION STATE (IF REQUIR			

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7. Transporter 2 Company Name		(UES 6	U.S. EPA ID	Number 9///	2000 2000	rses.	
Spesignated Facility some and Site Address Percure Nectorery It.	, , , ,		U.S. EPAID	Number	300 <u>(</u>	7/	
cincinating of 18232							
Facility's Phone: 513 - (48) - (42)	<u> </u>	Manuals and additional actions	1047	3 0¢Ç	0816	oles	9
ga. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Contai No.	Type	11. Total Quantity	12. Unit Wt./Vol.	13.	Waste Code	es .
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14. Special Handling Instructions and Additional Information 1. CHUP ICLO							***************************************
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15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are full marked end labeled/placarded, and are in all respects in proper condition for transport according to applicable it.	nternational and na	escribed abov tional governi	e by the proper s nental regulation	hipping nem s. It export s	e, and are cl	assified, paci I am the Prin	kaged, nary
Exporter, I cartify that the contents of this consignment conform to the terms of the attached EPA Acknowledgm I cartify Furthe was a minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator	ent of Consent.			***************************************			
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18. Discrepancy			<i>y</i>				
18e. Discrepancy Indication Space Quantity Type	Residue		Panial R	ejection	00	Full Ro	ejection
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Facility's Phone: 16c. Signature of Atternate Facility (or Generator)					1	Aonth D	ay Year
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and	recycling systems)						
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20. Designated Facility Owner or Operator. Certification of receipt of hazardous materials covered by the manifest a Printed Typed Name Signatur		em 16a . /				Morsth Da	iy: Yeat
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CleanHarbors	Land Disposal Res Notification Fo		Page : 1 of 1
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Line Item: Page No: Profile No	SALACTERIATED	LDR Dispose 2 (This is sub	* <i>'</i>
bwi, bwz, bcor		EPA Waste SubCatego Ignitables, except High To Corrosive Characteristic Toxicity Characteristic for	DC Liquids
	Certification		Applies to Manifest Line Items
Pursuant to 40 CFR 268.7(a), I hereby notify Part 268.	that this shipment contains	waste restricted under 4	0 CFR 1.
Signature: Conspicuosel Title: Conspicuosel	au Name	Lu-	E Marreso 8/24/B

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T.				se on elite (12-pitch) tor ID Number	typewriter.) D27	7894617		PW 3/3/	2011	Fo	rm Annrove	of Office No.	2050-0039
	Шx	NFORM HAZARD WASTE MANIFES	CTE	982546	814	2. Page pol	(800) 46			st Tracking	Number	0.4	
	11 6	enerator's Name an Commentious I	d Mailing Address Typodermi	28		122-242	Generator's Site A	ddiess (if differen	than mailing addr	IDD ess)	339	יידר	<u> </u>
	י וו	19 Mein St Yalenville, CT					SAME						
	[6. Tr	erator's Phone: (2 ransporter 1 Compar	ny Name		· · · · · · · · · · · · · · · · · · ·								
	7 7	Ansporter 2 Compan	ra Environn	ental Services	ino	_			U.S. EPA ID		322	250	
H		Jean	Hart	ממדיברים	Jiron n	70n h- 1	O'-			Number			
Ш	1	esignated Facility Na			1115077	KIM(4)	Sem	C93, 77	U.S. EPA ID	Number	383	320	CC25
Ш	1 2	lean Harbon 900 Rookuf	ويجسمة جملته	MOS ITAS A					ОН	000	724:	153	
П		Photos por po	44115	29-2402	, Hazard Class, ID Numb								
П	9a HM	and Packing Grou	up (if any))	Proper Shipping Name	, Hazard Class, ID Numb	ber,	10. C No.	Containers Type	11. Total Quantity	12. Unit WL/Vol.	13.	Wasle Code	es es
ģ		LW3098,	WASTE OX	IDIZING LIDUR	D, CORROSIVE	MAS		Туре	duanti	WILTVOI.	-	ļ -	
GENERATOR		(SODIUM	HITRATE, 1	ODIUM MITH	TE), S.1, (S), P	6 H	m	IDE	55	4	D001	D002	0007
GEN]2.					122	, ,		<u> </u>		<u> </u>	
		3,	······										
		5.			-								
	ļ	4.							1			*****	
		ļ*·											
	14. Sp	ecial Handling Instru	ctions and Addition	naf Information									
П		С1637880		ERG#140							•		
				IXS	5								
\parallel	15. G	ENERATOR'S/OFF	EROR'S CERTIFIC	ATION: Thereby decia	ire that the contents of the	his consignment are	fully and accurate	r described above	by the proper ship	ping name,	and are clas	silied pack	ned
П	E:	xporter. I certify that I certify that the waste	the contents of this minimization state	Consignment conform	condition for transport a to the terms of the attact R 262,27(a) (if I am a la	and only a appropri	NO BIROTI INCOMEST OF KI	riadonal governm	entai regulations.	ll export ship	ment and I a	m lhe Prima	iry
П	Gerjera	tor's/Offeror's Printer	a spoot tunic	Summar 4 4 4	rvzozizna) (a i airi a ia	Signal	lior) or (b) (il lam a	small quantity ger	rerator) is true.		Mon	h Day	Year
∄	16. Inte	malional Shipments		7040			nus	10	Mal	v	12	116	1/3
		orter signature (for e nsporter Acknowledgr	xports only);		<u> </u>	JExport from U.S		f entry/exit: eaving U.S.;					
		rier 1 Printed/Typed		violenals		Signate	ure	, ,	,,,		Mont	h Day	Vonr
2	Transpo	der 2 Printed/Typed	Nager E	RIC	Judg		<u> </u>	No	41			مآآيا	1/3
	1)enise	Bu	an as	Japan Fr	Sigpen	bn.	iko K	R. L	V	Mont	າ ຍືອງ	Vear
	18. Disci 18a. Disc	repancy crepancy Indication !	Space (V))						<u> </u>		110	1/3
1	00	65 na	Cix	Nuantity My W t	h Live		Residue	_	Partial Rejec	tion	Ď	Full Rejec	tion
1	8b. Alte	mate Facility (gr. Ger	nerator) (1	PSITURES	recent	2 A	Manifest Referen	nce Number:	1)470	15L	eus	#20	
ĉΙ	4	5747 SOA	2115	PSP Z S	70	7			U.S. EPA ID Nu				
ļ	acility's 8c. Sign	Phone: ** Pature of Allemate Fa	Constitution of the Contract o	atil) U	1 4025	2 2			10m	000	810	(92)	<u> </u>
Ļ	0 Hazar	rrinus Masta Donast	N								Mont	h Day	Year
1.			Management Med	2.	or hazardous wasle trea	itment, disposal, and	d recycling systems)	14.				
71		nated Facility Owner	Or Onamion Carl	figation of resolution									
Pi	rinted/Ty	ped Name	on operator, cert	ncation or receipt of haz	tardous materials covere	ed by the manifest Signatu		em 18a			Month	Day	Year
L A Fo	orm 870	00-22 (Rev. 3-05)	Previous adilio	C.C/		\\	Nucy	pul	<u>C</u>		17	BAI	0
			. Johnson Gullio	io are obsulete.		\sim	DEŠ	IGNATED FA	CILITY TO DE	STINATIO	ON STATE	. (IF REQ	UIRED)

Clean Herbore has the appropriate permits for and will accept the waste the generator is shipping

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Page:1 of1

Printed Date :Jul 12, 2013

MANIFESTINFO	RMATION	· · · · · · · · · · · · · · · · · · ·	\$ 5 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		************************	**********		
Generator: Connecticut Hypodermics					Manifest Tracking Info.			
Address: 519 Main St Yalesville,CT 06492					006533991FLE			
EPA ID #:	CTD982	2546814		Sa	les Order No: D2739461	7		
Line Item: P	Page No: Profile No: Treatability Group			p:	LDR Disposal Category			
1.		CH637880	WASTEWATER					
EPA Waste Code		L	L	FPA Wa	J ste SubCategory			
D001				Ignitables, except High TOC Liquids				
D002				Corrosive Characteristic				
D007				Toxicity Characteristic for Chromium				
	*	<u>Ce</u>			Applies to Manifest Line Items			
Pursuant to 40 CF Part 268.	R 268,7(a), I	hereby notify that t	this shipment contair	s waste res	tricted under 40 CFR	1.		
Waste analysis da Signature : Title :	ta, whole ava	ilable, is attached	S Print Nar	ne <i>(</i>	hris TUT	1		

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UNIFORM HAZARDOUS WASTE MANIFEST 21. Generator ID Number (Continuation Shoet) 27. Generator's Name (COOCCOST)	COTO	OOOO	991 PCC ·
25. Transporter 3. Company Name Clean Harburs Env. Serv. 27. Transporter 4. Company Name That Land Them put The Manner That Land The Manner The Manner That Land The Manner The Manne	ues Inc	U.S. EPA ID Number	3933345
Taniful Trans put In	ue	U.S. EPA ID Number	5KTU
278. U.S. DOT Description (Including Proper Shipping Name, Hezard Class, ID Number, and Packing Group (if any))	28. Containers No. Type	29. Total 30. Unit Quantity Wt./Vol.	31. Waste Codes
+///			
Special Handling Instructions and Additional Information			
Transporter 3 Acknowledgment of Receipt of Materials			
Transporter Acknowledgment of Receipt of Materials fod/Typed Name Signature			Month Day Year
Fransporter 4 Acknowledgment of Receipt of Materials red/Typed Name LE Character State Pract 128 7045 Signeture		≤le_	Menth Day Year
LECTURE SOLL PRUT 1287045 Signature LECTURE SOLL PRUT 1287045 Signature			107 126 113
rezardous Waste Report Management Method Codes (i.e., codes for hezardous waste Ireatment, disposal, and rec	ycling systems)		

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	(Co	ARDOUS WASTE MA		_ 1	= -	22.	Page	23. Mani	PPW 3/3 feat Tracking N	umber	,		
24. 1	Generator's N	ntinuation Sheet)	- I	924825	46814		3 of 3	00	6533	mifa	J		
		- A sel and	_,,	- with per	cowing.								_
25.	Transporter	3 Сотралу Малте	Cla	in Harkora C					U.S. EPA IC	Number			
26. 1	Transporter _	Company Name			wironmental Sen	nces Inc			MA	0039	322:	250	
			1/11	on ofabo	T WOIDIM	wfed 5	wesh	*	U.S. EPA ID	Number V3432 3	nz PD		
27a. HM	276. U.S. D and Packing	OT Description (including Group (if any))	Proper Shipp	ing Namo, Hazard Cla	ss, ID Number,		28. Containe		29. Total	30. Unit		Mhartic	<u> </u>
						 '	1 0.	Туре	Quantity	W1./Vol.		. Waste Co	ues T
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ransp ed/Ty	porter - yped Name	Acknowledgment of Rec	9≸ra rf Materi	its		1						احت	11
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azard	dous Wasta D	and Management Light	rd Cod "		······		′						
		Programment Wellk	u Lodes (i.e	, codes for hazardous	waste Irealment, disposal, a	nd recycling syste	ems)						_
							<u> </u>						
		3-05) Previous edition					ı			,			

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WEEKLY INSPECTION
RECORD EXAMPLE FOR
90-DAY PAD
12/3/13

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CONTAINER STORAGE AREA INSPECTION FORM

WEEKLY INSPECTION FORM FOR 12/3/13

FormCode COCMPFRM03

Full Name:		Date	: 1	2/3/20	13	
Location:	90 Day Pad	Milit	ary T	ime:		
Instructions must be exp	: Note condition of inspection items. If item doe lained below. Include any repairs, changes or ot	s not a	apply med	to an	area, mark N/A. All unsatisfac ons required or performed.	tory findings
	INSPECTION ITEM	YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT
Container Pla	acement and Stacking	(•	()			
Sealing of Co	ntainers	(• l				
Labeling of C	ontainers	(•)				
Containers	7	(• i				
Pallets		•				
					A CONTRACTOR OF THE CONTRACTOR	
Doors (indoo	r area)	•				-
				700 2000		7
Base / Found	ation / Roof	•				
Berms / Racks	,	•	Ci.	\bigcirc	a	=*
Debris and Re	efuse	•				
		4				
Warning Sign	S	•				

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Aisle Space	
Loading and Unloading Areas	
Sumps	
Alarm and Communication System	
Storage Capacity	
Bonding / Grounding	
Pumps	
Inventory Age	
On-Demand Work Ticket (please describe reason below)	
Select Overall Assessment of Inspection Results Pass	
Su	omit
<u> </u>	
Supervisor's Signature	

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WASTE PROFILE
FOR
WASTE WATER TREATMENT FLITTER
PRESS SOLUS

REPUBLIC Si. fiill as. INC.	Republic Serv 18500 N. Allied Way, Phoe	
	PECIAL WASTE DEPARTMENT	DECISION
	Waste Profile # Expiration Da 11/30/2013	ale
I. Decision Request:	200 (1900) 400 (1900) 100 (1900)	Change
Disposal Facility: 3684 - Countywide Land	and the second section of the second section of the second	
Generator Name: CLEAN HARBORS ENV		
Generator Site Address: 2900 ROCKEFE	LER AVE	
City: CLEVELAND	County: State: OH	Zip:
Name of Waste: WASTEWATER FILTERO	AKE SOLIDS W/O PLANT DEBRIS	*
Estimated Annual Volume: 4800 Tons	- Walter State of the State of	
II. Special Waste Department De Management Method(s): Landi	1 3	d Transfer Facility
Problematic Special Waste according to	Republic? Yes 21 No	
If yes, which one?	100 M 100 M	
Approved by Special Waste Review Con	mittee? Li Yes L. No	Not Applicable
Approved by operation viacio freshow com	El 100 El 100 El 100	
In order to keep this file active, a repre	54	analyzed (Full TCLP & RCI) by a Certified
Special Waste Analyst Signature:	Precautions, Conditions or Limitations of	
By signing below, the General Manager or special waste file is complete.	esignee agrees that a fully executed Special Waste	Service Agreement is on file for this profile and that the
General Manager or Designee: Date: 11/6/2012	Name (Printe	d):

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REPUBLIC SERVICES, INC.	Republic Services, Inc. 18500 N. Allied Way, Phoenix, AZ 85054	
	SPECIAL WASTE DEPARTMENT DECISION	
The state of the s	Waste Profile # Expiration Date	
I. Decision Request:	36841119889	
<u> </u>	L	
Disposal Facility: 3684 - Countywide Land		
Generator Name: CLEAN HARBORS ENV Generator Site Address: 2900 ROCKEFE		
City: CLEVELAND	[
<u> </u>		
Name of Waste: WASTEWATER FILTERO	AKE SOLIDS W/O PLANT DEBRIS	
Estimated Annual Volume: 4800 Tons		
II. Special Waste Department De	cision: 🗷 Approved 🔘 Rejected	
Management Method(s):		
Problematic Special Waste according to	Republic? 🔄 Yes 💹 No	
If yes, which one?	at 1111 abbet famous and a famous describes about the state of the sta	
Approved by Special Waste Review Com	mittee? Yes No Not Applicable	
	Precautions, Conditions or Limitations on Approval	
Special Waste Analyst Signature:	Name (Printed)	: Anne Micci
III. Facility Decision:	Approved Rejected	
	Precautions, Conditions or Limitations on Approval	
By signing below, the General Manager or special waste file is complete.	Designee agrees that a fully executed Special Waste Service Agreement is on file for this pro	ofile and that the
General Manager or Designee:	Name (Printed):	_

	•	•



SPECIAL WASTE PROFILE - RECERTIFICATION

Saveable fill-in form. Restricted printing until all requ	rired (yellow) fields are completed.		Waste Profile #				
Disposal 3684 Countywi	de LF OH	368	36841119889				
I. Generator Informatio	on						
Generator Name: Clean Harbor	s Env. Services, Inc.		<u> </u>				
Generator Site Address: 2900 F	Rockefeller Avenue						
City: Cleveland	County: Cuyahoga	State: Ohio		Zip: 44115			
State ID/Reg No:	State Approval/Waste Code:			NAICS #:			
Generator Mailing Address (if o	different): 2900 Rockefeller Av	enue					
City: Cleveland	County:	State: Ohio		Zip: 44115			
Generator Contact Name: Susa	an Sevy/Corporate Outbound	Email: sevys@cleanharbors.com					
Phone Number: (216) 429-2402		Fax Number	(216) 883-191	8			
II. Waste Stream Inform							
Name of Waste: WWT Filter ca	ke solids						
Check Section 1 OR Section 2	below: n a change in the characteristics of						
c. Char d. New waste If any of these completed. A appropriate si	changes have occurred, a new tach copies of the new chemica gnatures.	ne waste. concerning the laboratory an l analysis and	alysis and pro I new Special	file sheet must be Waste Profile with the			
2. There have be Updated analytic	en no changes that would alter the cical may be required.	physical chara	cteristics of the	e special waste stream.			
III. Representative Sam	ple Certification		☐ No S	Sample Taken			
Is the representative sample of	ollected to prepare this profile and noce with U.S. EPA 40 CFR 261.20(laboratory c) guidelines c	r YES o	or 👪 NO			
Sample Date: 10/08/12	Type of Sample: COMPOSI	TE SAMPLE	GRAB SAI	VIPLE			
Sample ID Numbers: Box139							
IV. Certification							
I hereby certify that to the best of	my knowledge and belief, the information	ation contained	in the Special W	aste Profile - Receminication			
Susan Sevy	al Special Waste Profile is true, compl		bors Environme	ental Services Inc.			
Authorized Represent	tive Name And Title (Printed)	_	Compai	ny Name			
	JX		11/1	/2012			
Authorized/Rep	presentative Signature		D	ate			

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CEL Cardinal Laboratories, Inc.

2870 Salt Springs Road • Youngstown, Ohio 44509

Ph: (330) 797-8844 • Fax: (330) 797-3264 • 1-800-523-0347

E-mail: cel@cardinalenvirolabs.net

Laboratory Analysis Report

Client: CLEAN HARBORS ENV. SERVICES

Attn: DOMINIC OKON 2900 ROCKEFELLER AVE CLEVELAND, OHIO 44115

Date Sampled: 10/8/2012 Time Sampled: 8:00

Date Received: 10/9/2012
Report Date: 10/18/2012

Comments:

Lab Number:

212100923 BOX 139

Sample ID:

Sample Description:

GRAB DOMIN Solid

Sampler Name:

DOMINIC OKON

Sample Matrix: PO#:

Analyte	Result	Unit	Detection Limit	Method	Analysis Date	Analyst
Cyanide, Reactive	BDL	mg/kg	60.3	7.3.3.2	10/18/2012	
Ignitability/Flashpoint	>180	ok _		1010	10/12/2012	
Mercury	BDL	mg/L	0.008	7470	10/15/2012	
рН	9.79	S.U.		9045 D	10/9/2012	TP
Prep - Herbicide				3510	10/12/2012	
Prep - Semi Volatile				3510	10/10/2012	
Prep - ICP Metals				6010	10/12/2012	
Prep - PCB				3550	10/11/2012	
Prep - Pesticides				3510	10/12/2012	
Sulfide, Reactive	BDL	mg/kg	121	7.3.4.2	10/18/2012	
TCLP-Extraction (Initial pH)	9.67	S.U.		40CFR 1311	10/9/2012	TP
Arsenic	BDL	mg/L	0.500	6010	10/12/2012	
Barium	BDL	mg/L	0.100	6010	10/12/2012	
Cadmium	BDL	mg/L	0.100	6010	10/12/2012	
Chromium	0.146	mg/L	0.100	6010	10/12/2012	
Lead	BDL	mg/L	0.300	6010	10/12/2012	
Selenium	BDL	mg/L	0.500	6010	10/12/2012	
Silver	BDL	mg/L	0.100	6010	10/12/2012	TP
Pesticides				8081		
Technical Chlordane	BDL	mg/L	0.003	8081	10/15/2012	
Endrin	BDL	mg/L	0.001	8081	10/15/2012	
Heptachlor	BDL	mg/L	0.001	8081	10/15/2012	
Lindane	BDL	mg/L	0.001	8081	10/15/2012	
Methoxychlor	BDL	mg/L	0.011	8081	10/15/2012	
Toxaphene	BDL	mg/L	0.025	8081	10/15/2012	JP
SURROGATES				8081		
TCMX	84		35-114%	8081	10/15/2012	
DCBP	91		43-116%	8081	10/15/2012	! JP
Polychlorinated Biphenyls (PCBs)				8082		
PCB-1016	BDL	mg/kg	1	8082	10/11/2012	
	BDL	mg/kg	2	8082	10/11/2012	
PCB-1221	BDL	mg/kg	1	8082	10/11/2012	
PCB-1232 PCB-1242	BDL	mg/kg	1	8082	10/11/2012	P JP
Lab Number: 212100923						

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CEL Cardinal Laboratories, Inc.

20001000	,			and the second of the second second		
PCB-1248	BDL	mg/kg	1	8082	10/11/2012	JР
PCB-1254	BDL	mg/kg	1	8082	10/11/2012	JP
PCB-1260	BDL	mg/kg	1	8082	10/11/2012	JР
SURROGATES				8082		
TCMX	42	%	23-123 %	8082	10/11/2012	JP
DCBP	44	%	30-107 %	8082	10/11/2012	JP
БСВ						
TCLP-Herbicides				8151		
2,4-D	BDL	mg/L	0.5	8151	10/14/2012	JP
SILVEX	BDL	mg/L	0.5	8151	10/14/2012	JР
SURROGATES		J		8151		
DCAA	92		35-114%	8151	10/14/2012	JР
DOM						
TCLP-Volatiles (VOC)				8260/5030		_
Benzene	BDL	mg/L	0.05	8260/5030	10/12/2012	JР
Carbon Tetrachloride	BDL	mg/L	0.05	8260/5030	10/12/2012	JР
Chlorobenzene	BDL	mg/L	0.05	8260/5030	10/12/2012	ΙP
Chloroform	BDL	mg/L	0.05	8260/5030	10/12/2012	1 b
1,2-Dichloroethane	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
1,1-Dichloroethene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
2-Butanone	BDL	mg/L	0.5	8260/5030	10/12/2012	Л
Tetrachloroethene	BDL	mg/L	0.05	8260/5030	10/12/2012	Ъ
Trichloroethene	BDL	mg/L	0.05	8260/5030	10/12/2012	JP
Vinyl Chloride	BDL	mg/L	0.1	8260/5030	10/12/2012	JP
SURROGATES				8260/5030		
Dibromofluorobenzene	100		86-118%	8260/5030	10/12/2012	JP
Toluene-d8	97		88-110%	8260/5030	10/12/2012	æ
Bromofluorobenzene	88		86-115%	8260/5030	10/12/2012	ſΡ
TCLP-Semi-Volatiles				8270	10/11/2012	JР
Cresols	BDL	mg/L	0.2	8270	10/11/2012	
1.4-Dichlorobenzene	BDL	mg/L	0.04	8270	10/11/2012	JP
2,4-Dinitrotoluene	BDL	mg/L	0.04	8270	10/11/2012	JP
Hexachlorobenzene	BDL	mg/L	0.04	8270	10/11/2012	JP JP
Hexachlorobutadiene	BDL	mg/L	0.04	8270	10/11/2012	•
Hexachloroethane	BDL	mg/L	0.04	8270	10/11/2012	JP JP
Nitrobenzene	BDL	mg/L	0.04	8270	10/11/2012	
Pentachlorophenol	BDL	mg/L	0.2	8270	10/11/2012	JP JP
Pyridine	BDL	mg/L	0.1	8270	10/11/2012	JP
2,4,5-Trichlorophenol	BDL	mg/L	0.2	8270	10/11/2012	
2,4,6-Trichlorophenol	BDL	mg/L	0.2	8270	10/11/2012	JΡ
SURROGATES				8270	10/11/2010	m
Nitrobenzene-d5	112		35-114%	8270	10/11/2012	JP
2-Fluorobiphenyl	112		43-116%	8270	10/11/2012	1b
p-Terphenyl	77		33-141%	8270	10/11/2012	JP
2-Fluorohenol	32		25-100%	8270	10/11/2012	JР
Phenol-d6	77		11-94%	8270	10/11/2012	JP
2,4,6-Tribromophenol	88		16-123%	8270	10/11/2012	JP
me i'm yarmamahama						

Lab Number: 212100923

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BDL = Below Detection Limit

Results approved by:	1.0.1	
John Pflugh, Lab Manager	JETY	
Tricia Presco, Chemist	100	
Wendy Hanna, Customer Re	lations	

Ohio EPA Drinking Water Certification: 1549, 898 Pennsylvania Laboratory Registration: 68-948

Lab Number: 212100923

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CHAIN OF CUSTODY
CARDINAL ENVIRONMENTAL LABORATORIES
2870 SALT SPRINGS ROAD, YOUNGSTOWN, OH 44509
PHONE: (330) 797-8944 FAX: (330) 797-3264

Billing Information (If different from Customer Information)

PHONE: (330) 797-8844 FAX: (330) 75 E-mail: cel@cardinalenvirolabs.ne			Citer 2 Ada	11 Name - 1930	nde	pendence AV	City/State	Cle	vel	md,	0# 2	, 94 1	<u>2</u> Phor	16-429-	495
CUSTOMER IN	FORMA	TIÓN			•								UIRED		
company Name Clean Harbors Environment 2 400 Rocke fellow Av Chysiaterzip Cleveland, OH 441	e,						Contract								
Dominic Okon							120	-					i		
none 216-429-2402 & 216	Fax	kond	ecu.	anh	arb	ers, com	12 P								
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Collector's Signature	····		Relinquis	hed By			Date/Th	nė	Recei	vet By	7			Date	Huc
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BLANK TRUCK TEACKING SHEET

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BLANK TRUCK TRACKING SHEET



Cleveland Facility TRUCK TRACKING SHEET

Rad	Scan

PPE (Circle One)	Leve	el B / Level C	
Date:		omer	
Generator:	· · · · · · · · · · · · · · · · · · ·		
Transporter:		Profile:	
Volume:	Trailer#	Truck#	
WASTE DESCRIPTIO	N		
LDRYE	S NO	One time	N/A
<u>H2S:</u> T40 Ra	ittler 3/	4 Gas Meter	
LEL <′ *contac	READINGS: (circ 10% > 10% * OX of Plant Supervisor, and 0-25, lab check flash po	YGEN <16% * > d or Compliance Ma	nager
TRUCK ARRIVAL TIM		Da	
**** If truck is not			truck must be rejected
Sample Rec'd in Lab	TIME AM/PM	DATE	INITIALS
Sample Approved	AM/PM		
Pump Started	AM/PM		
Finish Pump Time	AM/PM		
Sign Off Paperwork	AM/PM		
AS IS to Tank 2 3 6 PRETREATMENT POST TREATMENT TA	R1 R2 AR12	WAY K5 F039 AR34 6 7	Rinse Out Needed YES NO
Gallons of oil	to TKC	Verify	R1 or R2, Tank
ADDITIONAL COMMENTS: OFF SPEC REJECT NO	(CIRCL T SCHEDULED LATE	E IF APPLICABLE) ARRIVAL NO WOR	RK ORDER
TANKER CLE	AN OUT YES	NO	Initials
Yes, Interior of waste hat visual inspection	uling portion of veh	icle was rinsed an	d determined clean by
NO, there are some resi	dual solids, Amount		allons

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Trailer #:	

INCOMING ANALYSIS

Generator:		Date Received:			Date Pumped:			Time:				
Hauler:		Profil	e:	SO #:				Volume (gal):				
EPA Haz Wa	ste Codes:			Manifest #:			Volume (lb):					
CAT. DIS. S	TD.:	If Yes	<u>:</u>						S.G.:		***	
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Cr ⁶⁺			ppm	Oxidi	zer	ppm	C	C.O.D.			ppm	
Phenol			ppm	NO ₂		ppm	C	hloride			ppm	
Total P			ppm	NO ₃		ppm	C	ortho P			ppm	
PCBs		VOA			Oil/Gr	ease					ppm	
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Appendix D

Email correspondence between Susan Sevy of CHESI and Brenda Whitney of EPA.

Email dates: December 16, 2013 through January 15, 2014

Attachments:

- 1. Inspection log from 11/16/13 through 12/16/13
- 2. Used oil and antifreeze profiles
- 3. Inspection logs from 11/1/12 through 12/31/12 and 11/1/11 through 12/31/11
- 4. Contingency plan attachments
- 5. Weekly inspection log for 12/2/13
- 6. EPA Acknowledgment of Consent for exporting hazardous waste.

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Whitney, Brenda

From: Sent: Sevy, Susan J [sevys@cleanharbors.com] Wednesday, January 15, 2014 11:50 AM

Te:

Whitney, Brenda

Subject:

RE: Follow up on the 90- day issue we discussed

Attachments:

Burton-Sarnia Landfill 006682-3E-13.pdf; 2013-insp management.xlsx

Brenda, please see below. Please let me know if you need anything else from us!

Regards,

Susan

From: Whitney, Brenda [mailto:whitney.brenda@epa.gov]

Sent: Wednesday, January 15, 2014 10:51 AM

To: Sevy, Susan J

Subject: FW: Follow up on the 90- day issue we discussed

Sorry for the piecemeal emails, but I have one more request to attach to my email below.

Please provide a copy of the EPA Acknowledgment of Consent for the exported loads associated with the Tank 5 cleanout. I understand that you may need to obtain this notice from the primary exporter. The shipment dates that I have for those loads are from 9/23/13 (manifest 006835407FLE), 9/24/13 (manifest 006835409 FLE), and 11/12/13 (manifest 006768342 FLE). Please see attached. 006682/3E/13

ATTACHMENT 6

Thanks again!

BW

From: Whitney, Brenda

Sent: Tuesday, January 14, 2014 4:29 PM

To: 'Sevy, Susan J'

Subject: RE: Follow up on the 90- day issue we discussed

Hi Susan,

I did have a couple of follow-up remarks. The numbers correspond with my original email.

- Antifreeze may become contaminated with hazardous metals through use in an engine. It happens with some regularity, which is why some states (Michigan, for example) actually put antifreeze on their universal waste list. I would suggest you run a sample of the spent antifreeze to use in support of your non-hazardous waste claim. Generator knowledge is incomplete for this waste stream. We will do this.
- 3. I did not see an inspection for the 90-day drum pad for 12/2/2013, if there is one. Lucy provided the copy of the 12/3 inspection during the site visit, the attachment shows that it had been completed but in hard copy form. See line item #46 on spreadsheet. All the inspectors in Cleveland had connectivity issues on 12/2 and 12/3 intermittently. There have been two assorted times when our internet provider has been down; one from the weather and the other due to a cement truck taking the lines down. There was some difficulty in getting Cleveland running smoothly during that time. Please note that Cleveland exceeds the inspection requirement for the 90-day area, and inspects on a daily basis when in operation. Therefore the inspection did occur on the 12/2 and 12/3 dates. Please reference attachment.

5. Why is the satellite container not kept at the point of generation, which appears to be at the 2900 Rockefeller address? The maintenance employee brings the fluids/aerosols from the maintenance office and will perform work in every aspect of the plant where maintenance activities are required. It could be as simple as a lubricating endeavor to tearing down and repairing equipment. This activity would have so many satellite areas due to the nature of the maintenance activity. So we have been successful with all other agency audits using the maintenance shop for the satellite area for maintenance generated wastes. This would not be true if we generated a large quantity at one time during an activity. In this case, we drum it and ship immediately.

From: Sevy, Susan J [mailto:sevys@cleanharbors.com]

Sent: Tuesday, January 14, 2014 2:25 PM

To: Whitney, Brenda

Subject: RE: Follow up on the 90- day issue we discussed

Hello Brenda, I hope the attached satisfies all the inquiries. If not, please let me know. The last document is an example of the inspection management screen that shows the drop down box to assign the corrected circumstance for the missed inspection. The general inspector is not allowed into this screen. The GM or the compliance manager asks the inspector what happened, and assigns the status.

Please let me know what else I can do to assist with the audit process.

Regards,

Susan

From: Whitney, Brenda [mailto:whitney.brenda@epa.gov]

Sent: Tuesday, January 14, 2014 12:34 PM

To: Sevy, Susan J

Subject: RE: Follow up on the 90- day issue we discussed

Hi Susan,

I have a few questions and requests for you.

- 1. Regarding the antifreeze profile that you sent: I see that the waste determination for this waste stream was made using generator knowledge. I did not see a process description or any other information that would lend support to the knowledge used. Antifreeze may become hazardous through use, and an MSDS does not account for that use. Please let me know if you have any other supporting data for this waste stream. This antifreeze is coming from the truck maintenance shop only, so it is only from the trucks Clean Harbors maintenance mechanics maintain. There should not be any reason for this material to be anything else other than antifreeze and water. I have suggested we modify the profile to represent that, will that work for you?
- 2. Regarding the used oil profile that you sent: I believe that this material is going for recycling. If that is true, please note that the profile and containers of this material should not refer to this material as "waste oil" or "recyclable waste oil" (unless it is a requirement of DOT that you do so). Waste oils under RCRA are intended for disposal and require a hazardous waste determination. Please confirm that this material is to be recycled. The oil is in fact going for recycling and it is not RCRA waste. If you notice that since this is a profile used throughout the whole company, some of States do regulate the non hazardous oil streams generated within their State. These States do have their own waste codes that are recognized by their State only, and renders the material as a waste oil. This is the sole reason the word waste is employed in the profile. We have two selections of DOT descriptions to use; one as NON RCRA Hazardous, and the other waste oil. So since Ohio does not regulate non regulated/non hazardous oils, we opt for the first shipping description in this profile.

- 3. Regarding the inspection log that you sent: You sent a log reporting inspections from 11/16/2013 through 12/16/2013. It appears that inspections were not conducted at the 90-day pad between 11/25/13 and 12/4/13 (which is greater than 7 days). When I was at the facility, Luz gave me a record of inspections for 12/3/13. This record shows that inspections were conducted at the 90-day pad that day.
 - a. Do you know why this information may not have translated into the log that you sent me? Yes. Since this is an electronic system, there are times when connectivity does not occur for a multitude of reasons and cannot facilitate an inspection within the framework of the system design. I have attached a document that tracks the "missed inspections". A missed inspection to the electronic system is any inspection that is not completed in the electronic system. The far right indicates the reason for the "missed inspection" which may really not be missed but recorded in a hard copy format. These hard copies are maintained in a file for the year as the back up document to the electronic system. This is why Lucy was able to produce a hard copy for you, but that hard copy is not available in the inspection log. The inspection management screen which is a different tool within the inspection workbench that tracks inspections that may have been accounted for other than electronically, Or, inspections that were truly missed, or did not need to occur on a non-operating day.
 - b. Might there also be a record for 12/2/13 (which would make it 7 days)? The scanned document should provide compliance with your request. As you saw hard copy on site, and the account of the hard copy is in the copy of the inspection management log I have provided.
 - c. Please forward me records for November 1 through December 31 for the years 2011 and 2012. See attachments

Luz gave me a copy of the contingency plan for the 2900 site so that I could review it at the office. The plan references tables and appendices, which I do not have. Please forward me the following: Tables G1, G2, and G3, and Appendix G2. Attached

5. Is it accurate to use the MAD039322250 EPA ID number to identify the buildings at the 2930 Independence address (drum hub, truck maintenance area, and field services building)? I am considering these areas to be conditionally exempt small quantity generators of hazardous waste because they generate aerosol cans, ignitable liquid wastes, used oil, and universal waste. Please let me know if you think this designation is incorrect. MAD039322250 is okay to identify the Truck to Truck transfer activity as it is a terminal for the corporate entity. The satellite area is waste that Plant Maintenance generates. The Plant maintenance shop is not located at the permitted facility but the waste is generated by conducting maintenance at the permitted facility (2900 Rockefeller Avenue). This waste does get identified as OHD000724153 waste, shipped out under OHD000174153 and is reported for on the annual report to the State of Ohio under that EPA ID#.

Please let me know if you have any questions or concerns, or if my questions/requests do not make sense to you. I would be happy to elaborate if needed.

Thanks!	
Brenda	

ATTACHMONT

Brenda Whitney
Environmental Engineer
U.S. EPA - Region 5
77 W. Jackson Boulevard, LR-8J
Chicago, Illinois 60604
312-353-4796 (ph)
312-385-5505 (fax)

From: Sevy, Susan J [mailto:sevys@cleanharbors.com]

Sent: Monday, December 16, 2013 10:25 AM

To: Whitney, Brenda

Subject: Follow up on the 90- day issue we discussed

Hello Brenda, here is the information that I promised to provide. The first two pages are the actual inspection form for the 90 pad area. The remaining pages show the date that the 90 day inspection was completed. It should be under the "Area" column. Please note that Clean Harbors Cleveland Facility exceeds the inspection requirement of a weekly requirement by inspecting the area daily! — Attachment I

I have also attached the profiles as requested during the audit. - ATTACHMENT 2

Please let me know what else I can help you with. Thank you.

Susan

WEERLY INSPECTIONS
90-Day Drum Pao
November 16, 2013
THROUGH
DECEMBER 16, 2013

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WEERLY INSPECTIONS 90-DAY DRUM PAD NOV 16, 13 - DEC 16, 13



CONTAINER STORAGE AREA INSPECTION FORM

FormCode COCMPFRM03

Full Name:					Date	12	/16/20	013	
	0 Day Pad			Milita					
Instructions:	: N	lote condition of i	nspection items. de any repairs, ch	If item doe anges or ot	s not a her re	pply medi	to an al acti	area, mark N/A. All unsatisfa ons required or performed.	ctory findings
		INSPECTIO			YES	NO	N/A	REASON FOR FAILURE	WORK TICKET STAT
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Aisle Space	
Loading and Unloading Areas	
Sumps	
Alarm and Communication System	
Starrage Councilly	
Storage Capacity	
Bonding / Grounding	
Pumps	
Inventory Age	
On-Demand Work Ticket (please describe reason below)	
Select Overall Assessment of Inspection Results Pass	
Select Overall Assessment of Inspection Results Pass	
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Supervisor's Signature	

Inspection Log

Location:	CL - Clean Harbors Env Servi	ces Inc - 2900 Rockefeller Avenue	
Inspection Status:	All All	Area: All	
Inspection From Date:	11/16/2013	Inspection To Date: 12/16/2013	 Approval Status:

Passed

Failed

	Location	Inspection	Inspection By	Inspection Date	Inspection Status	Type	Inspection Frequency	Area	Area Type	Арргочес Ву	Approved Date	Appr
	CL	DAILY TIT INSPECTION	oren hargrove	12/16/2013	P	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility	· · ·		
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	CL	CONTAINER STAGING	Lucy Marrero	12/13/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad			
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	CL	STAGING	Marrero	12/04/2013	F	REQD	DAYS	Pad	Pad		
			le eee	# 1 E			5 Years		٠.		
!	CL	Tank Internal	Susan Sevy	12/04/2013	Р	TANK		LIMESILO	Tank		
				1			Inspection				
1 .		:Tank				:	1 Year from		:		4.6
1 1	CL	External	Susan Sevy	12/04/2013	Р	TANK	Last	LIMESILO	Tank		
olevet.			67h t				Inspection	~		8 8	
	CL.	INSPECTION	Albert Benavides	12/04/2013	F	LANDLORD	WEEKLY	Cleveland Facility	Facility .		
		ALTONOMIA SELLEN	· · · · · · · · · · · · · · · · · · ·					· active	WACTE		•
		TANK	Lucy			PERMIT	: DAY - 5	wwr	WASTE - WATER		:
1	CL	SYSTEMS	Marrero	11/25/2013	F	REQD	DAYS		TREATMENT		
						-			AREA		
		SIIE	Lucy			PERMIT	DAY - 5	Plant	Empty		
	CL	SECURITY	: Marrero	11/25/2013	F	REQD	DAYS	Yard	Storage		=
								•	Area		
	CL	LAROBATORY	Lucy Marrero	11/25/2013	Р	PERMIT	DAY - 5	Cleveland	Facility		:
:		LABORATORY	. nanero			REQD	DAYS	Facility			

	CL	CONTAINER STAGING	Lcy Marrero	11/25/2013	F .	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad	:	
	CL	GM WEEKLY INSPECTION	Albert Benavides	11/25/2013	F	LANDLORD	WEEKLY	Cleveland Facility	Facility		
	CL	DAILY TTT INSPECTION	oren hargrove	11/25/2013	۴	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility		
2	CL	TANK SYSTEMS	Lucy Marrero	11/22/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA		
2	CL	SITE SECURITY	Lucy Marrero	11/22/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area	•	
	CL	CL LABORATORY	Lucy Marrero	11/22/2013	₽	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility		
	CL	CONTAINER STAGING	Lucy Marrero	11/22/2013	F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage :		
1	CL	DAILY TTT INSPECTION	oren hargrove	11/22/2013	Р	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility		
	CL	DAILY TTT INSPECTION	oren hargrove	11/21/2013	р	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility		
	CL	TANK SYSTEMS	Lucy Marrero	11/21/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA	e e e e e e e e e e e e e e e e e e e	
2	CL	SITE SECURITY	Lucy Marrero	11/21/2013	F .	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area		
	CL.	CL LABORATORY	Lucy Marrero	11/21/2013	₽	PERMIT REQD	DAY - 5 DAYS	Cleveland Facility	Facility		
	CL	CONTAINER STAGING	Lucy Marrero	11/21/2013	. F	PERMIT REQD	DAY - 5 DAYS	90 Day Pad	Storage Pad		
	CL	Tank External		11/20/2013	Р	TANK	1 Year from Last Inspection	R2	Tank		:
	CL	<u>Tank</u> External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	TK9	Tank		
	Cl.	Tank External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	TK8	Tank		
	CL	<u>Tank</u> External	susan sevy	11/20/2013	P	TANK	1 Year from Last Inspection	R1	Tank	:	
	CL	Tank External	susan sevy	11/20/2013	Р	TANK	1 Year from Last	AR34	Tank		
	CL	: : <u>Tank</u> : <u>External</u>	susan sevy	11/20/2013	Р	TANK	Inspection 1 Year from Last	AR12	Tank	e e e e e e e e e e e e e e e e e e e	
	CL	TANK SYSTEMS	Lucy Marrero	11/20/2013	F	PERMIT REQD	DAY - 5 DAYS	WWT Plant	WASTE WATER TREATMENT AREA		
	CL	SITE SECURITY	Lucy Marrero	11/20/2013	F	PERMIT REQD	DAY - 5 DAYS	Plant Yard	Empty Storage Area		
1	CL	CL LABORATORY	Lucy Marrero	11/20/2013	P	PERMIT REOD	DAY - 5 DAYS	Cleveland Facility	:		
	CL	CONTAINER STAGING	Lucy Marrero	11/20/2013	,F	PERMIT REOD	DAY - 5 DAYS	90 Day Pad	Storage Pad	4	
*	CL	GM WEEKLY INSPECTION	Albert Benavides	11/20/2013	F	LANDLORD	WEEKLY	Cleveland Facility			

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USED OIL É. ANTIFREEZE PROFILES

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Safety-Heen & A Clean Harbors Company

WASTE MATERIAL PROFILE SHEET

Profile No. 150105

A. GENERAL INFORMATION GENERATOR EPA ID #/REI		PENDING	GENER	ATOR NAME:	Clean H	arbors Env	Service	s Inc			
GENERATOR CODE (Assig ADDRESS 42 Longwate	ned by Clean Harbors)	CLE234	CITY	Norweli		ROVINCE	MA	ZIP/POSTAL	CODE	02061	
CUSTOMER CODE (Assign		CLE234	CUSTO	MER NAME:		PHONE: arbors Env	Service	s Inc			
ADDRESS 42 Longwate	, ,	GLL254				ROVINCE	MA	ZIP/POSTAL	CODE	02061	
B. WASTE DESCRIPTION WASTE DESCRIPTION:	OIL, USED	NOT-REG									
PROCESS GENERATING V	VASTE: COR	E USED OIL									
IS THIS WASTE CONTAINE	D IN SMALL PACKAGI	NG CONTAINED WITHIN A LA	RGER S	HIPPING CONTAINER	₹? No						
C. PHYSICAL PROPERTIES	S (at 25C or 77F)										
PHYSICAL STATE		NUMBER OF PHASES/LA	YERS			VISCOSITY (CC	LOR	
SOLID WITHOUT FREE POWDER	LIQUID	1 2 3	TO	o.oo		1 - 100 (6	e.g. Wate	er)	1 ,	aries	
MONOLITHIC SOLID		% BY VOLUME (Approx.)	MID	DLE 0.00		101 - 500) (e.g. Mo	otor Oil)	<u>*</u>	ares	
LIQUID WITH NO SOLI			BO	TTOM 0.00		501 - 10,	000 (e.g.	Molasses)			- 1
LIQUID/SOLID MIXTUR % FREE LIQUID	IE.	ODOR				> 10,000			-		- 1
% SETTLED SOLID		✓ NONE		BOILING POINT F	(°C)	MELTING PO	DINT °F (OTAL OR	GANIC	
% TOTAL SUSPENDE SLUDGE	ED SOLID	MILD		<= 95 (<=3	35)	- 44	0 (~00)	c	ARBON		
GAS/AEROSOL		STRONG		95 - 100 (3	35-38)		0 (<60)	201		= 1%	
0/10/11/10002		Describe:		101 - 129 ((38-54)		200 (60-9	93)		9%	
				>= 130 (>5	54)	7 20	0 (>93)		<u>'</u>	= 10%	
FLASH POINT °F (°C)	pH	SPECIFIC GRAVITY		ASH	,		BTU/L	B (MJ/kg)			
< 73 (<23)	<= 2	< 0.8 (e.g. Gasoline)		< 0.1	>	20		< 2,000 (<4.6)	•		
73 - 100 (23-38)	2.1 - 6.9	0.8-1.0 (e.g. Ethanol)		0,1 - 1.0	c	Jakaowa		2,000-5,000 (4	1.6-11.6)		
101 -140 (38-60)	7 (Neutral)	1.0 (e.g. Water)		1.1 - 5.0	- ئىسى			5,000-10,000	(11.6-23.2)	
141 -200 (60-93)	7.1 - 12.4	1.0-1.2 (e.g. Antifreeze)	i ,	5,1 - 20,0			☑	> 10,000 (>23	.2)		
> 200 (>93)	>= 12.5	> 1.2 (e.g. Methylene C	hloride)	3.1 - 25.5			Actual:				
		on of the waste, include any iner S. Please do not use abbreviati		nents and/or debris. Ra	nges for in	dividual comp	onents a	re acceptable.	lf a trade r	name is	
CHEMICAL			•	•			MIN			MAX	UOM
MOTOR OIL							50.000	0000	100.00	00000	%
DOES THIS WASTE CONT LONG, METAL REINFORC PIECES OF CONCRETE >	ED HOSE >12" LONG,	GE METAL DEBRIS OR OTHE METAL WIRE >12" LONG, ME	R LARGE TAL VAL	E OBJECTS (EX., META VES, PIPE FITTINGS, 1	AL PLATE CONCRET	OR PIPING > TE REINFORG	·1/4" THIC CING BAI	CK OR >12* R OR	YES		NO
If yes, describe, inclu	uding dimensions:										
DOES THIS WASTE CONT	AIN ANY METALS IN P	OWDERED OR OTHER FINEL	Y DIVID	ED FORM?					YES	Y	NO
DOES THIS WASTE CONT FLUIDS, MICROBIOLOGIC POTENTIALLY INFECTIOU	AL WASTE, PATHOLO	ACTED ANY OF THE FOLLOW GICAL WASTE, HUMAN OR A	ING; AN NIMAL D	IMAL WASTES, HUMA ERIVED SERUMS OR	N BLOOD PROTEIN	, BLOOD PRO IS OR ANY O'	DUCTS, THER	BODY	YES	Y	NO
I acknowledge that t based on my knowle	his waste material is ne edge of the material. Se	ither infectious nor does it conta lect the answer below that appl	in any o ies:	rganism known to be a	threat to h	uman health,	This cert	ification is			
The waste was neve	er exposed to potentially	infectious material.							YES		NO
Chemical disinfection	n or some other form of	sterilization has been applied to	the was	ste.					YES		NO
LACKNOWLEDGE THAT TO	HIS PROFILE MEETS	THE CLEAN HARBORS BATTE	RY PAC	KAGING REQUIREME	NTS.				YES	:	ИО
I ACKNOWLEDGE THAT M	Y FRIABLE ASBESTO	S WASTE IS DOUBLE BAGGE	D AND V	VETTED.					YES	Y	NO
SPECIFY THE SOURCE CO	ODE ASSOCIATED WI	TH THE WASTE. G08		SPECIFY THE F	ORM COL	E ASSOCIAT	ED WITH	THE WASTE	- W206		

SAPI - HPPI * Profile No. 150105 A Clean Harbors Company

E.	CONSTITUENTS

Are these	values	based	on	testing	or	knowledge?
				_		

Knowledge

If based on knowledge, please describe in detail, the rationale applied to identify and characterize the waste material. Please include reference to Material Safety Data Sheets (MSDS) when applicable. Include the chemical or trade-name represented by the MSDS, and or detailed process or operating procedures which generate the waste.

Knowledge of process chemistry or MSDS

Please indicate which constituents below apply. Concentrations must be entered when applicable to assist in accurate review and expedited approval

D004 D005 D006 D007	ARSENIC		mg/l				
D006 D007	D & DILANA	5.0				$oldsymbol{arnothing}$	
D007	BARIUM	100.0				I	
	CADMIUM	1.0				y	
	CHROMIUM	5.0				<u> </u>	
D008	LEAD	5.0				7	
D009	MERCURY	0.2				<u> </u>	
D010	SELENIUM	1.0				V V	
D011	SILVER	5.0				V	
		-					
D040	VOLATILE COMPOUNDS			OTHER CONSTITUENTS		MAX UOM	NOT
D018	BENZENE	0.5		BROWNE			APPLICABLE
D019	CARBON TETRACHLORIDE	0.5		BROMINE			
D021	CHLOROBENZENE	100.0		CHLORINE			<u></u>
D022	CHLOROFORM	6.0		FLUORINE			<u> </u>
D028	1,2-DICHLOROETHANE	0.5		IODINE			
D029	1,1-DICHLOROETHYLENE	0.7		SULFUR			Z
D035	METHYL ETHYL KETONE	200.0		POTASSIUM			
D039	TETRACHLOROETHYLENE	0.7		SODIUM			V
D040	TRICHLOROETHYLENE	0.5		AMMONIA			Ø
D043	VINYL CHLORIDE	0.2		CYANIDE AMENABLE		* * - + - * * * *	V
	SEMI-VOLATILE COMPOUND	*************		CYANIDE REACTIVE			M
ከለሳያ				CYANIDE TOTAL			ja
D023	o-CRESOL	200.0		SULFIDE REACTIVE			
D024	m-CRESOL	200.0		COLLIDE RENOTIVE			
D025	p-CRESOL	200.0		HOCs		PCBs	
D026	CRESOL (TOTAL)	200.0		NONE		NONE	
D027	1,4-DICHLOROBENZENE	7.5		< 1000 PPM		< 50 PPM	
D030	2,4-DINITROTOLUENE	0.13		>= 1000 PPM		>=50 PPM	
D032	HEXACHLOROBENZENE	0.13		100511111			
D033	HEXACHLOROBUTADIENE	0,5	• • • • • • • •			IF PCBS ARE PRESENT WASTE REGULATED B	
0034	HEXACHLOROETHANE	3.0				CFR 761?	
0036	NITROBENZENE	2.0				YES 🛂	NO
0037	PENTACHLOROPHENOL	100.0				الشا	,,
	PYRIDINE	- 5.0					
0041	2,4,5-TRICHLOROPHENOL	400.0					
	2,4,6-TRICHLOROPHENOL	2,0					
	PESTICIDES AND HERBICIDE						
* ~ *	ENDRIN	0.02			-		
0013	LINDANE	0.4					
0014	METHOXYCHLOR	10.0					
0015	TOXAPHENE	0.5					
0016	2,4-D	10.0					
0017	2,4,5-TP (SILVEX)	1.0					
	CHLORDANE HEPTACHLOR (AND ITS EPOXIDE	0.03					
DITIONAL	HAZARDS VASTE HAVE ANY UNDISCLOSED I		CIDENTS ASS	OCIATED WITH IT, WHICH COL	JLD AFFEC	T THE WAY IT SHOULD BE H	ANDLED?
YES	NO (If yes, explain)						
	THAT APPLY	•					
	-	EVDI OCU C		E(11.01.10		ODILA DEGLE :===	OADOMO SELIS
TIPA REC	GULATED SUBSTANCE	EXPLOSIVE		FUMING		OSHA REGULATED	CARCINOGENS

\$31611-HCCII • Profile No. 150105

A Clean Harbors Company

F. R	EGULAT				114 DTEO						
	YES	IX.J	NO	USEPA HAZARDOUS \	WASIE						
	YES		NO	DO ANY STATE WAST	E CODES A	PPLY7				listidaniania ideblariairana literitatia ta sheksare tantha e 1900	manarotuvendom lang
				017L 221 223 7777	CR02 MAS	8 R014 VT99 X007	nyang mpanananananananananananananananananana	Construction of the Constr	والمساورة والمراجعة والمراجعة والمساورة والمراجعة والمساورة والمراجعة والمراجعة والمراجعة والمراجعة والمراجعة	ghermaline salaahikasaannohiskanikkisilesine	
P				b	TXEXEMP						
	YES		МО	DO ANY CANADIAN PI	ROVINCIAL	WASTE CODES APP	LY?			·····	
		F 71		254T					TO AS OFFI DARK SANS		J
	YES	4	МО	IS THIS WASTE PROH LDR CATEGORY:			WIIHOUT FURTHER	IKEAIMENIPE	:R 40 CFR PART 2001		
				VARIANCE INFO:	NOT SUD	ject to LDR		~		namen dejanisas papanja indigenya, menintuka di sahuja papanga puminyi da	
	YES	V	NO	IS THIS A UNIVERSAL	WASTE?						
	YES	•	NO	IS THE GENERATOR O	OF THE WA	STE CLASSIFIED AS	CONDITIONALLY EX	EMPT SMALL QU	JANTITY GENERATOR (CES	QG)?	
	YES	V	NO	IS THIS MATERIAL GO	ING TO BE	MANAGED AS A RCF	RA EXEMPT COMME	RCIAL PRODUCT	r, WHICH IS FUEL (40 CFR 26	61.2 (C)(2)(II))?	
	YES	V	NO	DOES TREATMENT OF	THIS WAS	STE GENERATE A FOO	06 OR F019 SLUDGE	?			
	YES		МО	IS THIS WASTE STREA	AM SUBJEC	T TO THE INORGANI	C METAL BEARING	WASTE PROHIBI	TION FOUND AT 40 CFR 268	.3(C)?	
	YES	Y	NO	DOES THIS WASTE CO	OV NIATNO	C'S IN CONCENTRAT	IONS >=500 PPM?				
	YES	Y	NO	DOES THE WASTE CO	NTAIN GRI	EATER THAN 20% OF	ORGANIC CONSTIT	UENTS WITH A	VAPOR PRESSURE >= .3KPA	(.044 PSIA)?	
	YES	*	NO	DOES THIS WASTE CO	NA NIATNO	ORGANIC CONSTITU	ENT WHICH IN ITS I	PURE FORM HAS	S A VAPOR PRESSURE > 77	KPA (11.2 PSIA)?	
	YES	V	NO	IS THIS CERCLA REGU	JLATED (SI	JPERFUND) WASTE	?				
	YES	Y	NO	IS THE WASTE SUBJE	CT TO ONE	OF THE FOLLOWING	S NESHAP RULES?				
				Hazardous Organi	c NESHAP	(HON) rule (subpart G) Phar	maceuticals produ	uction (subpart GGG)		
	YEŞ		NO	IF THIS IS A US EPA H	AZARDOUS	WASTE, DOES THIS	WASTE STREAM C	ONTAIN BENZEN	≀E?		
		YES		NO Does the wast	e stream co	me from a facility with o	one of the SIC codes	listed under benze nical manufacturin	ene NESHAP or is this waste ring, coke by-product recovery, c	egulated under the	benzene v process?
		YES				f this waste stream a fa					, ,
		What	t is the	TAB quantity for your fac	cility?] Megagram/year (1 f	Mg = 2,200 lbs)			
		The I	basis f	or this determination is: k	(nowledge o	f the Waste Or Test D	ata		Knowledge Te	esting	(Parameter)
		Desc	ribe th	e knowledge :		· · · · · · · · · · · · · · · · · · ·		······································			
G. DO	T/TDG	INFOR	RMATI	ON							
DOT/	TDG PR	OPER	SHIP	PING NAME:							
				ZARDOUS WASTE L		•					
	RECY	/CLA	BLE	WASTE OIL (LEACH	ABLE TO	(IC) WASTE NOT R	REGULATED BY I	DG, (BC HW, A	AB W (201, UN 2541)		
				REQUIREMENTS FREQUENCY ONE TI	ME WEE	KLY MONTHLY	QUARTERLY YEA	ARLY OTHER			
			со	NTAINERIZED		l v	BULK LIQUID		BULK SOLID		
	0-0	CONT	AINEF	RS/SHIPMENT		CALLONS/SHIPME	 NT: <i>1.00 Min -</i> 999	9.00 GAL.	SHIPMENT UOM:	TON	YARD
	RAGE C					CALLO NO, OTHER MAL	Max	3,00	TONS/YARDS/SHIPMENT:	0 Min - 0 Max	
00.		SIC YA		OX PALLET							
	TOT	TE TAN	ΝK	DRUM							
	TFO	HER:		DRUM SIZE:							
. SPE	CIAL RE	EQUES	ST						···········		
CO	MMENTS	OR RE	QUEST	r's:							
				Dat							
l ce cert	ify that an	am auth y sampi	norized les sub	to execute this decument as	he aclual was	e. If Clean Harbors discov	t all information submitted vers a discrepancy during	d in this and attached the approval proces	documents is correct to the best of is, Generator grants Clean Harbors	my knowledge. I also the authority to amend	I
	AUT	HORIZ	ZED S	IGNATURE	NΑ	ME (PRINT)		TITLE		DATE	
_	_					·					
										 	
Δc	CER Sec.	264,12	require	ed notice:							
	renuluari.h	v Feder	ral Res	ource Conservation and Reco	overy Act requ	lations found in 40 CFR F	art 264.12(b) and all equ	ivalent State hazardo	ous waste regulations, notice is her	eby provided that all C	lean
Hai	required b bors facili	ties that	t may b	e used to treat, store, and for	dispose of th	e hazardous waste descrit	ed on this waste profile i	ave the appropriate	ous waste regulations, notice is here permits and the capacity to manage een changes in the chemical compo	inese wasies,	



Profile No. 150105

Addendum

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

USED OIL (MADEP MA98 - OFF SPEC) NON DOT REGULATED USED OIL NON DOT REGULATED WASTE OIL NON DOT REGULATED

safety-Heen.

WASTE MATERIAL PROFILE SHEET

A Clean Harbors Company

Profile No. 150163

A. GENERAL INFORMATIO GENERATOR EPA ID #/REI GENERATOR CODE (Assig	GISTRATION # ned by Clean Harbors)	PENDING CLE234	GENER			rbors Env :	Services Inc MA ZIP/POST	TAL CODE	02061	
ADDRESS 42 Longwate	r Drive				Pł	HONE:				
CUSTOMER CODE (Assign ADDRESS 42 Longwate	,	CLE234	CUSTO		Clean Har STATE/PRO		Services Inc MA ZIP/POST	TAL CODE	02061	
B. WASTE DESCRIPTION WASTE DESCRIPTION:	ANTIFREEZE - BUL	LK								
PROCESS GENERATING V	VASTE: bulk	AF collection								
IS THIS WASTE CONTAINE	D IN SMALL PACKAG	ING CONTAINED WITHIN A LA	ARGER S	HIPPING CONTAINER	? No					
C. PHYSICAL PROPERTIES	3 (at 25C or 77F)	•								
PHYSICAL STATE SOLID WITHOUT FREE POWDER MONOLITHIC SOLID LIQUID WITH NO SOLII		NUMBER OF PHASES/LA 1 2 3 BY VOLUME (Approx.)	TOF MID	DLE 0.00		1 - 100 (e	If liquid present) .g. Water) (e.g. Motor Oil) 000 (e.g. Molasses)	<u>v</u> a	LOR aries	
LIQUID/SOLID MIXTUR			- DO	том <i>0.00</i>		> 10,000	700 (e.g. Molasses)]		-
% FREE LIQUID % SETTLED SOLID % TOTAL SUSPENDE SLUDGE GAS/AEROSOL	D SOLID	ODOR NONE MILD STRONG Describe:		BOILING POINT °F (° <= 95 (<=35 95 - 100 (35 101 - 129 (3 V >= 130 (>54	5) 5-38) 38-54)	MELTING PO < 140 140-2	NT °F (°C)) (<60) 200 (60-93)) (>93)	1-	GANIC = 1% 9% = 10%	
FLASH POINT ºF (ºC)	рH	SPECIFIC GRAVITY		ASH			BTU/LB (MJ/kg)			
<73 (<23) 73 - 100 (23-38) 101 -140 (38-60) 141 -200 (60-93) 200 (>93)	<= 2 2.1 - 6.9 7 (Neutral) 7.1 - 12.4 >= 12.5	< 0.8 (e.g. Gasoline) 0.8-1.0 (e.g. Ethanol) 1.0 (e.g. Water) 1.0-1.2 (e.g. Antifreeze > 1.2 (e.g. Methylene C		< 0.1 0.1 - 1.0 1.1 - 5.0 5.1 - 20.0	> 2	20 known		0 (4.6-11.6) 00 (11.6-23.2)	f	
D. COMPOSITION (List ti	ne complete compositio	on of the waste, include any ine	rt compon	ents and/or debris. Rang	ges for indiv	vidual compo	nents are acceptab	le. If a trade n	ame is	
used,		S. Please do not use abbreviati				1	MIN		MAX	UOM
ETHYLENE GLYCOL WATER							45.0000000 45.0000000	90,000 90,000		<u>%</u> %
LONG, METAL REINFORCE PIECES OF CONCRETE >3	ED HOSE >12" LONG, *)?	GE METAL DEBRIS OR OTHE METAL WIRE >12" LONG, ME						" YES		NO
If yes, describe, inclu		ANADERED OF OTHER EINE	Valuable	TO FORM					17.41	
DOES THIS WASTE CONTA	AIN OR HAS IT CONTA AL WASTE, PATHOLO	OWDERED OR OTHER FINE ACTED ANY OF THE FOLLOW GICAL WASTE, HUMAN OR A	/ING; ANI	MAL WASTES, HUMAN				YES	V	NO NO
	nis waste material is nel	ther infectious nor does it conta lect the answer below that appl		ganism known to be a th	nreat to hum	nan health. 1	This certification is	-		
The waste was never	exposed to potentially	infectious material.						YES		NO
Chemical disinfection	or some other form of	sterilization has been applied to	o the was	te.				YES		NO
I ACKNOWLEDGE THAT TH	IIS PROFILE MEETS T	THE CLEAN HARBORS BATTE	ERY PACI	KAGING REQUIREMEN	∜TS.			YES		NO
I ACKNOWLEDGE THAT M	Y FRIABLE ASBESTO	S WASTE IS DOUBLE BAGGE	D AND W	ETTED.				YES	¥	NO
SPECIFY THE SOURCE CO	DE ASSOCIATED WIT	TH THE WASTE, G09		SPECIFY THE FO	RM CODE	ASSOCIATE	ED WITH THE WAS	TE. W219		

Safety-Kleen. A Clean Harbors Company

Profile No. 150163

E.	С	О	N	S	TI	Т	U	E	N	Т	:
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D013 LINDANE 0.4 D014 METHOXYCHLOR 10.0 D015 TOXAPHENE 0.5 D016 2,4-D 10.0	Are these v	alues based on testing or knowledge?	✓ Knowledge	Testing				
								Data Sheets (MSDS)
March Marc	£		name represented by the A	ASDS, and or	detailed process or operating i	procedures w	nich generate the waste.	1
RCRIA RESULATED METALS RESULT RE	Please	indicate which constituents belo	w apply. Concentrat	ions must l	e entered when applicat	le to assis	t in accurate review and e	xpedited approval
MATERIAN								• • • •
DOOR CAMMAN DOOR	RCRA	REGULATED METALS			TOTAL	UOM	NOT APPLICABLE	
CORPORATION 10 10 10 10 10 10 10 1	D004	ARSENIC	5.0				\square	
D009	D005	BARIUM	100.0				Ø	
LEAD 500 LEAD 50	D006	CADMIUM	1.0				V	
MERCURY	D007	CHROMIUM	5.0				<u> </u>	
DECEMBER DECEMBER	D008	LEAD	5.0					
DOTA SALVER			0.2					
VOLATILE COMPOUNDS		• • • • • • • • • • • • • • • • • • •			************		Served	
D019 ENZENE D.5 BROWNE	D011	SILVER	5.0				<u></u>	
D029					OTHER CONSTITUENT	S	MAX UOM	
DOZ2					DDC#ANN"			
DO22								
DO29								
D029								know.Z
D0050 METHYLETHYLIKETONE 20.0 POTASSIUM								
D059								
D040 TRICHLOROETHYLENE 0.5 AMMONIA				• • • • • • • • • • • • • • • • • • • •				
DOM3			m		AMMONIA			
D023	D043				CYANIDE AMENABLE			Ø
D024 M-CRESOL 200.0 SULPIDE REACTIVE		SEMI-VOLATILE COMPOUNDS	·		CYANIDE REACTIVE	-		N
D025 P-CRESOL 200.0 HOCs PCBs	D023				CYANIDE TOTAL			laur 4
D026 CRESOL (TOTAL) 200.0 HOUS	D024	m-CRESOL	200.0		SULFIDE REACTIVE			Ø
D026 CRESOL (TOTAL) 200.0	D025	p-CRESOL	200.0		Hoce		PCRe	
1,000 PPM	D026	CRESOL (TOTAL)	200,0		1		,	
D032	D027	1,4-DICHLOROBENZENE	7.5		en and			
D032 HEXACHLOROBENZENE 0.13	D030	2,4-DINITROTOLUENE	0.13				ľ	
D034 HEXACHLOROBUTADIENE 3.0 CFR 761?	D032	HEXACHLOROBENZENE	0.13		100011111		<u>[</u>	IC THE
D036 NITROBENZENE 2.0 YES ✓ NO D037 PENTACHLOROPHENOL 100.0 D038 PYRIDINE 5.0 D041 2.4.5-TRICHLOROPHENOL 400.0 D042 2.4.5-TRICHLOROPHENOL 2.0 PESTICIDES AND HERBICIDES D012 ENDRIN 0.02 D013 LINDANE 0.4 D014 METHOXYCHLOR 10.0 D015 TOXAPHENE 0.5 D016 2.4-D 10.0 D017 2.4.5-TP (SILVEX) 1.0 D020 CHLORDANE 0.03 D031 HEPTACHLOR (AND ITS EPOXIDE) 0.008 D0110NAL HAZARDS ES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES ✓ NO (If yes, explain) D036 OSHA REGULATED SUBSTANCE EXPLOSIVE FUMING OSHA REGULATED CARCINOGENS	D033	HEXACHLOROBUTADIENE	0.5				WASTE REGULATED BY	
D037 PENTACHLOROPHENOL 100.0	D034	HEXACHLOROETHANE	3.0				CFR 761?	
D038 PYRIDINE 5.0 D041 2.4,5-TRICHLOROPHENOL 400.0 D042 2,4,6-TRICHLOROPHENOL 2.0 PESTICIDES AND HERBICIDES D012 ENDRIN 0.02 D013 LINDANE 0.4 D014 METHOXYCHLOR 10.0 D015 TOXAPHENE 0.5 D016 2,4-D 10.0 D020 CHLORDANE 0.03 D031 HEPTACHLOR (AND ITS EPOXIDE) 0.008 DITIONAL HAZARDS ES THIS WASTE HAVE ANY UNDISCLOSED HAZARDS OR PRIOR INCIDENTS ASSOCIATED WITH IT, WHICH COULD AFFECT THE WAY IT SHOULD BE HANDLED? YES NO (If yes, explain) ODSE ALL THAT APPLY DEA REGULATED SUBSTANCE EXPLOSIVE FUMING OSHA REGULATED CARCINOGENS					1		YES 🛂	ИО
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YES NO (If yes, explain) OOSE ALL THAT APPLY DEA REGULATED SUBSTANCE EXPLOSIVE FUMING OSHA REGULATED CARCINOGENS	DITIONAL	HAZARDS						
DEA REGULATED SUBSTANCE EXPLOSIVE FUMING OSHA REGULATED CARCINOGENS		[Ta]	AZARDS OR PRIOR INCI	DENTS ASSC	OCIATED WITH IT, WHICH CO	OULD AFFEC	ET THE WAY IT SHOULD BE H	ANDLED?
DEA REGULATED SUBSTANCE EXPLOSIVE FUMING OSHA REGULATED CARCINOGENS								
			EXPLOSIVE		FUMING		OSHA REGIII ATEN	CARCINOGENS
						AL	r	

Profile No. 150163 A Clean Harbors Company

	14)	NO	USEPA HAZARDOUS W.	ASTE?				
YES YES		NO	DO ANY STATE WASTE	CODES A	PPLY?			
			030L 342 7777 CR04	MA99 R	015 X007			···
			Texas Waste Code 77	XEXEMP	T			
YES	Y	NO	DO ANY CANADIAN PRO	OVINCIAL	WASTE CODES APPLY?			
YES	į.	NO	IS THIS WASTE PROHIB	ITED FRO	OM LAND DISPOSAL WITHOUT FURTHER TREA	ATMENT PE	ER 40 CFR PART 268?	
			LDR CATEGORY:	Not sub	ject to LDR			
	,		VARIANCE INFO:					
YES		NO	IS THIS A UNIVERSAL W	ASTE?				
YES	~	NO			STE CLASSIFIED AS CONDITIONALLY EXEMPT			
YES	e e e e e e e e e e e e e e e e e e e	NO	IS THIS MATERIAL GOIN	IG TO BE	MANAGED AS A RCRA EXEMPT COMMERCIAL	L PRODUC	T, WHICH IS FUEL (40 CFR 261.2 (C)(2)(II))?	
YES		NO			TE GENERATE A F006 OR F019 SLUDGE?			
YES	E3	NO	IS THIS WASTE STREAM	A SUBJEC	T TO THE INORGANIC METAL BEARING WAST	re prohib	ITION FOUND AT 40 CFR 268.3(C)?	
YES		NO			C'S IN CONCENTRATIONS >=500 PPM?			
YES	Y	NO	DOES THE WASTE CON	TAIN GRE	EATER THAN 20% OF ORGANIC CONSTITUENT	IS WITH A	VAPOR PRESSURE >= .3KPA (.044 PSIA)?	
YES	<u>Y</u>	NO	DOES THIS WASTE CON	NA MIATI	ORGANIC CONSTITUENT WHICH IN ITS PURE	FORM HA	S A VAPOR PRESSURE > 77 KPA (11.2 PSIA	\)?
YES		NO	IS THIS CERCLA REGUL	ATED (SI	PERFUND) WASTE?			
YES	Y	NO	IS THE WASTE SUBJECT	T TO ONE	OF THE FOLLOWING NESHAP RULES?			
			Hazardous Organic	NESHAP ((HON) rule (subpart G) Pharmaceu	uticals produ	uction (subpart GGG)	
YES		NO	IF THIS IS A US EPA HAZ	ZARDOUS	WASTE, DOES THIS WASTE STREAM CONTA	IN BENZEI	NE?	
	YES		NO Does the waste s NESHAP rules b	stream con ecause th	me from a facility with one of the SIC codes listed a coriginal source of the waste is from a chemical n	under benz nanufacturi	ene NESHAP or is this waste regulated under ng, coke by-product recovery, or petroleum refi	the benzene inery process?
	YES		NO Is the generating	source of	this waste stream a facility with Total Annual Ben	zene (TAB) >10 Mg/year?	
			TAB quantity for your facili	•	Megagram/year (1 Mg = 2	2,200 lbs)		
	The	basis f	or this determination is: Kno	owledge o	f the Waste Or Test Data	in a second second second second second second second second second second second second second second second	Knowledge Testing	and the same of th
	Desc	ribe th	e knowledge :					
. DOT/TDG	INFOR	ITAMS	ON					
			PING NAME:					
					ETHYLENE GLYCOL SOLUTION (LESS TR	HAN 50%;	"	
			EEZE FOR RECYCLIN	G NON L	OO! REGULATED			
			REQUIREMENTS FREQUENCY ONE TIM	E 🗹 W	EEKLY MONTHLY QUARTERLY YEARI	LY OTH	ER	
		co	NTAINERIZED		BULK LIQUID		BULK SOLID	
			S/SHIPMENT		in the second se	5.11	SHIPMENT UOM: TON	YARD
0-0	CONT				GALLONS/SHIPMENT: 1.00 Min -9999.00	GAL.	OTHER MENT COME.	
STORAGE (CAPAC				Max		TONG WADDO SHIPMENT BALL BALL	
STORAGE (CAPAC R TYPE	:		:	Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma.	
STORAGE (CONTAINER CU	CAPAC R TYPE IBIC YA	: NRD B			Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma.	
STORAGE (CONTAINE) CU TO	CAPAC R TYPE	: NRD B	DX PALLET DRUM		Max Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma.	
STORAGE (CONTAINER CU TO OT	CAPAC R TYPE IBIC YA ITE TAI THER;	:: NRD BI	OX PALLET		Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma.	
CONTAINER CU TO OT	CAPAC R TYPE IBIC YA ITE TAI THER:	i: NRD BI NK ST	DX PALLET DRUM DRUM SIZE:		Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma .	
STORAGE (CONTAINER CU TO OT	CAPAC R TYPE IBIC YA ITE TAI THER:	i: NRD BI NK ST	DX PALLET DRUM DRUM SIZE:		Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma .	
STORAGE CONTAINER CU TO OT	CAPAC R TYPE IBIC YA ITE TAI THER:	i: NRD BI NK ST	DX PALLET DRUM DRUM SIZE:		Max		TONS/YARDS/SHIPMENT: 0 Min - 0 Ma.	
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STORAGE CONTAINER CU TO OT SPECIAL R COMMENTS I certify that at the profile, at	CAPAC R TYPE JBIC YA JTE TAJ THER; REQUES S OR RE S CERTII I am autt s Clean is	E: ARD BI NK ST QUEST PICATION TO THE TENT OF THE TEN	DX PALLET DRUM DRUM SIZE: S: ON to execute this document as an nitted are representative of the deems necessary, to reflect the	aclual waste e discrepane	agent. I hereby certify that all information submitted in this a. If Clean Harbors discovers a discrepancy during the ap	proval proces	d documents is correct to the best of my knowledge, I	X also
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STORAGE CONTAINER CU TO OT SPECIAL R COMMENTS L certify that at the profile, as	CAPAC R TYPE JBIC YA JTE TAJ THER; REQUES S OR RE S CERTII I am autt s Clean is	E: ARD BI NK ST QUEST PICATION TO THE TENT OF THE TEN	DX PALLET DRUM DRUM SIZE: S: ON to execute this document as an nitted are representative of the deems necessary, to reflect the	aclual waste e discrepane	agent. I hereby certify that all information submitted in this a. If Clean Harbors discovers a discrepancy during the ap	proval proces	d documents is correct to the best of my knowledge. I ss, Generator grants Clean Harbors the authority to am	X also
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Addendum

G. DOT/TDG INFORMATION

DOT/TDG PROPER SHIPPING NAME:

USED ANTIFREEZE NON DOT REGULATED

WEEKLY INSPECTION LOGS OF 90-DAY PAD

> NOVEMBER - DECEMBER, 2012 AND

NOVEMBER - DECEMBER, 2011

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CLI STAGINS CLI STAGINS DARY FILE CL INSPECTION SENTRANCE WELLIS	Marrero 12/51(/01) E Corea hargrove 12/31/2012 P Susan	REOD DAYS PERMIT DAY 5 REOD DAYS DANDIO	90 bay Frirage Fall Facility Clevelan d Facility Elevelan	
CL INSPECTION G CAME VISITIAL C	1347 1347 1347 1347 1372 1372 1372 1372 1372 1372 1372 137	PERMIT DAY 5 PRIQUE DAYS	I Facility Facility, Waster, Water, Water, Flant in Area Flant Trougy Flant Storage	
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GE BAGGIO I DALLYTTE CL INSPECTION E	Marretty, 12/28/2012 F. oren hargrove 12/28/2012 P	PERMIT: DAY 5 REQUE DAYS PERMIT: DAY 5	Fad Fad Clevelan d Facility Facility Waste Wate, WW. Frentne	
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CONTAINER CL STAGING DAILYTH CL INSPECTION	Susan Sevy 12/27/2012 P oren hargrove 12/27/2012 P	PERMIT DAY - 5 REQD DAYS PERMIT DAY - 5 REQD DAYS	Olytolor 90 Day Storage Pad Pad Clevelan O Facility Facility	
CL STESSERING	Sevy 12/26/2012 F Sevy 12/26/2012 F Sevy 12/26/2012 F	PERMIT DAY 5 REGIS DAYS PERMIT DAY 5 REGIS DAYS	White WWI Treatne Plant RLAWs Cinpty Plant Storage Vaid Area	
CONTAINER CLUSTAGING ONLY FREE CONTAINER	Susan 12/26/2012 P Susan Sevy 12/26/2012 P Susanuenta	PERMIT DAY 5 REQUE DAY 5 REQUE DAYS TANDED	Clevelan in Earlity Dutdoor 90 Day Storage Fad Pad	
CC NSPECTION OALY TT CC INSPECTION WHITE CC MSPECTION WETT	5 17/25/2012 F Oren 12/25/2012 P hargrove 12/25/2012 P 11/53/11 12/21/2012 P	PERMIT DAY 5 REQD DAYS LENDED	Clevelan d Facility Facility Clevelan Refacility Facility	
CL SIL SECOND	Hicy (9)31/2012 F.	PERMIT DAY S RELIEV DAYS PERMIT DAY D REOD DAYS	Waste Will Treatne Flant It Area Land Should Stand	
DARYTH CI INSPECTION	Lucy Marrero for Oren Hargrove 12/21/2012 P	REQD DAYS PERMIT DAY 5	Clevelan d Facility Facility	
CL STANDARDAY	Mariem (22/1/2012 1 Tocy Mariem (7/21/2012 1 Tocy	REQUE DAYS PERMIT DAYS REQUE DAYS PERMIT DAYS	dJ ficility facility Continue SP Day Storage Pad Paris Water Water Water	
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C GLANGATOR	Tucy Manero 12/79/2012	PERMIT DAY S REOD DAYS	Clevelan d Eachly Lacisty	

CONTRACTOR CONTRACTOR	Mariero 122.0/2015 ENTE PARIER ENTE PERSONAL 12/20/2015 TUP 12/2015 Filling Mariero 12/14/2015	CANDLO SUNTE DAY OF THE SECOND	Chiving Paris Chival Paris Chiving Paris Chival Paris Chiving Paris Chiving Paris Chiving Paris Chival Paris Chiving Paris Chival Paris Chival Paris Chival Pari	
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C INSPECT	NIC bucy Charge 12/19/2012 Marrico 12/19/2012 Fully Plants Pennero 12/17/2012	PERMIT DAY	Suppose Storage Suppos	
DAILY I INSPECT	100 Hargrove 12/37/2012 FOO: RATOR: Marceld 12/17/2017 HIRE Licy: Planton 13/17/2019 Ordinal Marcel Albert	PERMIT DAY. RECO DAY: PERMIT DAY. RECO DAY: PERMIT DAY. PERMIT DAY. RICOD DAY. EANISIG		
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CL Tankirds	ma SEVY 12/13/2012 SUSAN	P TANK Inspect L:Year in L:Year in L:Set List List List List List List List Lis	ion TK9 Tank on Cutdoor on TK8 Tank	

	SUSAN	1 Year from Last	Outdoor	
CL <u>Fank Ext</u> i	susan emal sevy 12/13/2012	P TANK Inspection 1 Year from Last P TANK Inspection 1 Year from 1 Year from	TK5 Tank Outdoor TK3 Tank	
CL Tank Ext	susan	P TANK Inspection	Ouldoor TK1 Tank	
CL <u>Tank Exti</u>	Susan		LIMESIL Indoor O Tank Outdoor TK7 Jank	
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NEEKLY INSPECTIONS 90-DAY DRUM PAD NOV-DEC, 2011

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ATTACHMENTS TO CONTINGENCY PLAN

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Table G-2

List of Emergency Coordination Agreements

Clean Harbors Env. Services, Inc. 2900 Rockefeller Ave. Cleveland, Ohio 44115

A. FIRE/AMBULANCE

City of Cleveland Fire Department

1645 Superior Ave.

Cleveland, Ohio 44114

Contact: Cleveland Fire Chief

Emergency Number:

911

Non-Emergency Number:

(216) 664-6350

Primary response agency for all emergency situations. Service:

Provide fire control/containment and emergency rescue.

В. **POLICE**

City of Cleveland Police Department

Justice Center

1300 Ontario St.

Cleveland, Ohio 44114

Contact: Police Chief

Emergency Number:

911 or (216) 621-1234

Non-Emergency Number:

(216) 623-5000

Service: Control of traffic and criminal activity

C. **HOSPITALS**

St. Vincent Charity Hospital

2351 E. 22nd St.

Cleveland, Ohio 44115

Contact: Head Nurse (ER)

(216) 363-2536

General Calls:

(216) 861-6200

Metrohealth Medical Center

Emergency Room Number:

2500 Metrohealth Drive.

Cleveland, Ohio 44109

Contact: Head Nurse (ER)

Emergency Room Number:

(216) 778-4152

(216) 398-6000

Emergency medical services. Service:

CHESI-Cleveland Contingency Plan

General Calls:

Table G-2: List of Emergency Coordination Agreements

1 of 2

D. OHIO EPA – EMERGENCY RESPONSE TEAM

Office of Emergency Response

OEPA – Northeast District

2110 E. Aurora Rd.

Twinsburg, Ohio 44087

Contact: Reginald Brown - Emergency Response Supervisor

24-hour Emergency Number: (800) 282-9378

Service: Environmental damage assessment/coordination

E. CUYAHOGA COUNTY EMERGENCY MANAGEMENT

Cuyahoga County Emergency Management (LEPC)

1255 Euclid Ave.

Cleveland, Ohio 44115

Contact: Brandy Carney – SARA Information Coordinator

24-hour Emergency Number: (216) 771-1365

Non-Emergency Number:

(216) 443-5691

Service: Environmental damage assessment/coordination

F. **SEWER**

Northeast Ohio Regional Sewer District (NEORSD)

4747 E. 49th St.

Cuyahoga Heights, Ohio 44125

Contact: Scott Broski

24-hour Emergency Number: (216) 641-3200

Non-Emergency Number:

(216) 641-6000

Service: Sewer Discharge Monitoring

G. EMERGENCY RESPONSE CONTRACTORS

Clean Harbors Env. Services, Inc. - Field Services Division

2930 Independence Ave.

Cleveland, Ohio 44115

Contacts: Clay Curtis – General Manager

24-hour Emergency Number: (216) 857-7910

Paul DiCarro – Coordinator

24-hour Emergency Number: (216) 857-5705

Inland Waters of Ohio

2195 Drydock Ave.

Cleveland, Ohio 44115

Contact: Vince Ambers – Field Services Supervisor

24-hour Emergency Number: (216) 861-3949

Services: Emergency clean-up, pumping, hauling.

CHESI-Cleveland Contingency Plan

Table G-2: List of Emergency Coordination Agreements

2 of 2

TABLE G-3: EMERGENCY EQUIPMENT CAPABILITIES

EQUIPMENT

CAPABILITIES

Fire sprinkler system has numerous pull stations with strobe lights that will render an audible alert when engaged. This system is connected to a monitoring system that will make the necessary notification to the local fire department authority.

* Telephones

Direct-dial access to outside emergency agencies. Equipped with loud speaker function for emergency announcements and instructions.

* Fire Extinguishers

1) Hand-held units, 5-20 lb. charges {ammonium phosphate}, rated for Class A:B:C fires.

2) Hand-held units, 5 lb. charge (Halon), rated for Class B:C fires.

* Fire Hoses

Fire hose stations (2) with 1.5" hoses.

* Sprinkler System

Heat activated sprinkler system in process buildings.

* Eyewash/Showers (Stationary) Fixed-base deluge showers and eyewash stations for flushing eyes and/or entire body.

* First Aid Kits

General first aid for minor personal injuries such as cuts, scrapes, burns, etc.

* SCBAs

MSA units [3 x 60 minute; 1 x 30 minute] with belt-mounted positive pressure/pressure demand regulators and fiberglass fully-wound composite cylinders.

* Respirators/Cartridges

Full-face and half-face masks (MSA) for air purifying cartridges including: GME-H Super Cartridges for organic vapors, acid gases, ammonia, formaldehyde, hydrogen fluoride, and toxic dusts, fumes and mists; and CMC-H cartridges for organic vapors, acid gases, and toxic dusts, fumes, and mists.

* Tyvel< Suits

Polyethylene-coated and Saranex-coated Level "C" suits for protection against contact with spilled/splashed liquids.

* PVC Gloves/Boots

Foot and hand protection from contact with spilled/splashed liquids.

* Safety Glasses/Goggles

Eye protection against moderate impact hazards, metal chips, particulates, and sparks. Goggles and/or faceshields provide eye protection against splashed liquids.

* Evewash Bottles

16 oz. hand-held units for flushing eyes.

* Absorbents

Speedi-Dri absorbent media for use in cleaning up spilled liquids.

* Buckets/Salvage Drums

Various sizes up to 85-gal. salvage drums.

For containerization of liquids, solids, and/or other leaking containers.

EQUIPMENT

CAPABILITIES

Shovels/Squigees/Brooms

General earth/absorbent moving, construction of berms/dikes to contain spilled liquids, etc.

Sump Pumps w/ Hose

Removal of spilled liquids from containment areas .

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Table G-1

List of Emergency Coordinators

Clean Harbors Env. Services, Inc. 2900 Rockefeller Ave. Cleveland, Ohio 44115

A. Primary Emergency Coordinator

Albert Benavides- General Manager

Office phone:

(216) 429-2402 ext. 209

Home phone:

(440) 582-1621

Home address:

7655 Creekwood Drive

North Royalton, Ohio 44133

24-hour Emergency Numbers:

(216) 857-2228

(Nextel)

B. First Alternate

Dominic Okon- Lab Manager

Office phone:

(216) 429-2402 ext. 216

Home phone:

(216) 932-6541

Home address:

1925 Revere Rd.

Cleveland Heights, Ohio 44118

24-hour Emergency Numbers:

(216) 857-2230 (Nextel)

C. Second Alternate

Demarcus Dues-Reactor Operator

Office phone:

(216) 429-2402 ext. 218

Home phone:

(440) 488-6357

Home address:

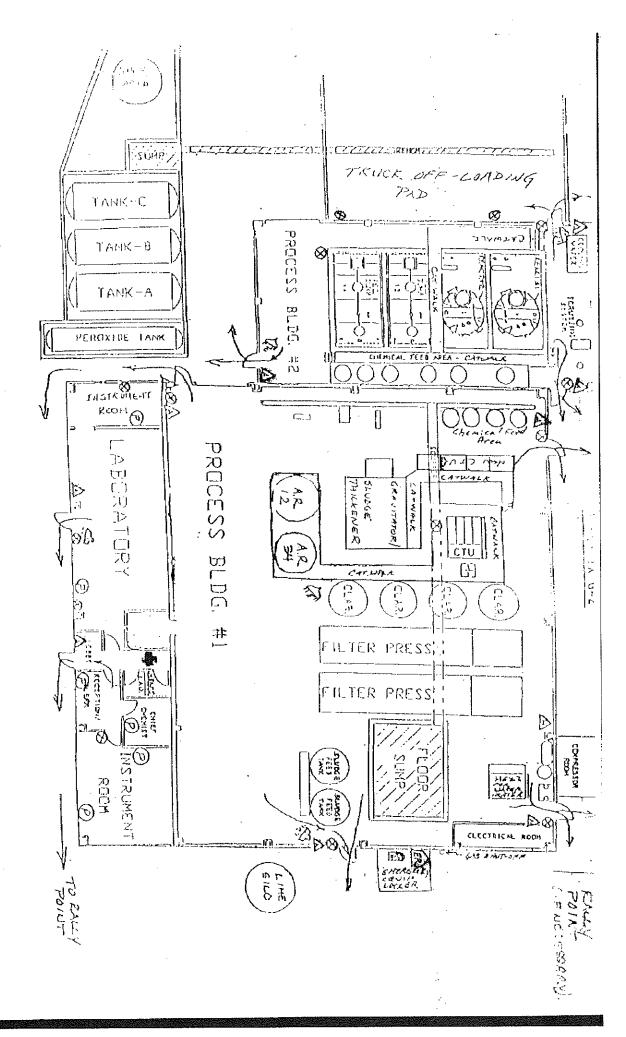
208 Stone Ridge Way

Berea, Ohio 44017

24-hour Emergency Numbers:

(216) 214-7004 (Nextel)

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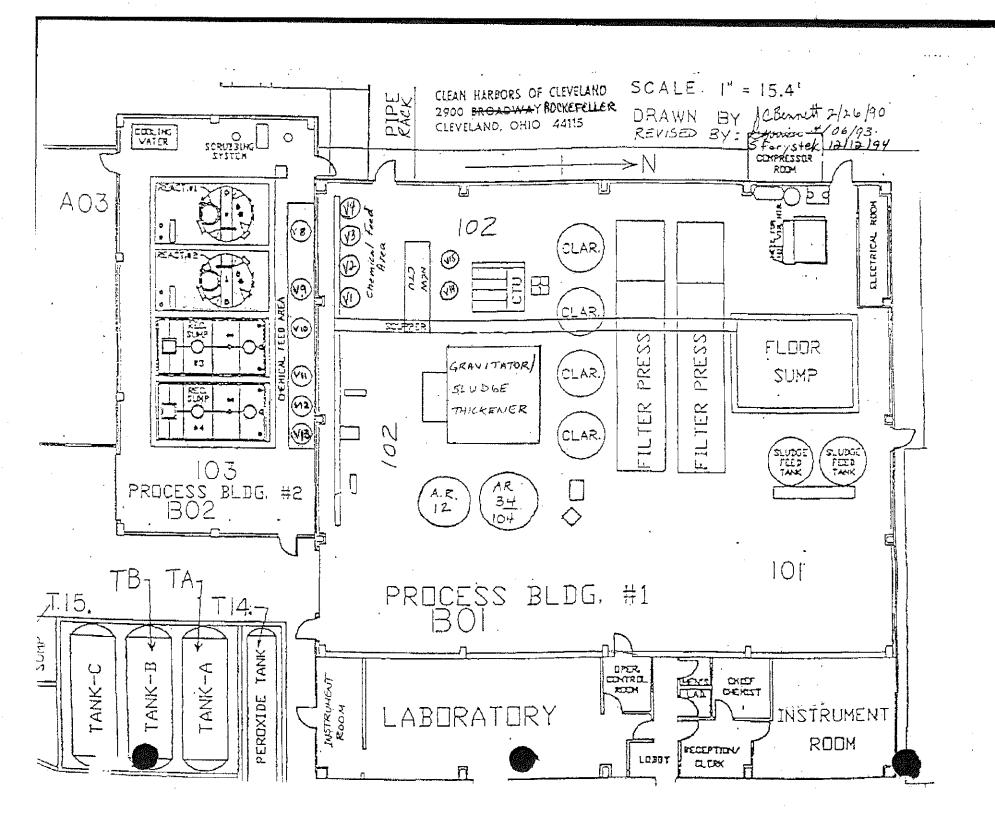
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EPA ACKNOWLEDMENT OF CONSENT FOR EXPORTED MATERIALS





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

June 6, 2013

JAMES R. LAUBSTED CLEAN HARBORS ENVIRONMENTAL SERVICES INC. G4475 SOUTH DORT HIGHWAY, BURTON, MI US 48529 MIR000014530

> Re: Foreign Notice ID: 531446 EPA Notice ID: 006682/3E/13

Dear JAMES R. LAUBSTED:

This is to acknowledge receipt of your notice, which was received by EPA on March 14, 2013, of intent to export hazardous waste to Canada as required by Title 40, Code of Federal Regulations, Part 262, Subpart E, Section 262.53 promulgated pursuant to the Resource Conservation and Recovery Act (RCRA). In accordance with the U.S.-Canada Bilateral Agreement on the Transboundary Movement of Hazardous Waste, the U.S. Environmental Protection Agency (EPA) forwarded your notice to the Government of Canada and Canada has no objection to your shipment(s) of hazardous waste.

This letter constitutes the EPA Acknowledgment of Consent for the export of the following hazardous waste as specified in your notice:

Waste Stream 1: SOILS, SOLIDS, DEBRIS CONTAMINATED WITH SPENT POTLINER
Waste Description: SOILS, SOLIDS, DEBRIS CONTAMINATED WITH SPENT
POTLINER

EPA Waste Code:

DOT Shipping Name: Aluminum smelting by-products or Aluminum remelting by-products

DOT Hazard Class: 4.3 DOT I.D. No. UN3170

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 2: SPENT HALOGENATED SOILS, SOLIDS, DEBRIS AND RESIDUES
Waste Description: SPENT HALOGENATED SOILS, SOLIDS, DEBRIS AND
RESIDUES

EPA Waste Code:

DOT Shipping Name: Toxic solids, organic, n.o.s.

DOT Hazard Class: 6.1 DOT I.D. No. UN2811

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 3: CONTAMINATED CORROSIVE, ORGANIC SOILS, SOLIDS & DEBRIS Waste Description: CONTAMINATED CORROSIVE, ORGANIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:

DOT Shipping Name: Toxic solids, corrosive, organic, n.o.s.

DOT Hazard Class: 6.1 DOT I.D. No. UN2928

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 4: CONTAMINATED INORGANIC TOXIC SOILS, SOLIDS & DEBRIS Waste Description: CONTAMINATED INORGANIC TOXIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:

DOT Shipping Name: Toxic solid, inorganic, n.o.s.

DOT Hazard Class: 6.1 DOT I.D. No. UN3288

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 5: CONTAMINATED CORROSIVE, INORGANIC SOILS, SOLIDS & DEBRIS

Waste Description: CONTAMINATED CORROSIVE, INORGANIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:

DOT Shipping Name: Toxic solid, corrosive, inorganic, n.o.s.

DOT Hazard Class: 6.1 DOT I.D. No. UN3290

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 6: ALKALI SOLIDS, SOLIDS, DEBRIS AND RESIDUES CONTAINING HEAVY METALS

Waste Description: ALKALI SOLIDS, SOLIDS, DEBRIS AND RESIDUES CONTAINING HEAVY METALS

EPA Waste Code:

DOT Shipping Name: Corrosive solids, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN1759

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 7: CONTAMINATED CORROSIVE & TOXIC SOILS, SOLIDS & DEBRIS Waste Description: CONTAMINATED CORROSIVE & TOXIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:

DOT Shipping Name: Corrosive solids, toxic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN2923

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 8: CONTAMINATED CORROSIVE & BASIC, INORGANIC SOILS, SOLIDS & DEBRIS

Waste Description: CONTAMINATED CORROSIVE & BASIC, INORGANIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:

DOT Shipping Name: Corrosive solid, basic, inorganic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN3262

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 9: CONTAMINATED ORGANIC CORROSIVE & BASIC SOILS, SOLIDS & DEBRIS

Waste Description: CONTAMINATED ORGANIC CORROSIVE & BASIC SOILS, SOLIDS & DEBRIS

EPA Waste Code:

DOT Shipping Name: Corrosive solid, basic, organic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN3263

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 10: NEUTRALIZED SOILS, SOLIDS, DEBRIS & RESIDUES FROM METAL FINISHING WASTE TREATMENT PROCESSES

Waste Description: NEUTRALIZED SOILS, SOLIDS, DEBRIS & RESIDUES FROM METAL FINISHING WASTE TREATMENT PROCESSES

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 11: ORGANIC DEBRIS

Waste Description: ORGANIC DEBRIS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 12: INORGANIC DEBRIS

Waste Description: INORGANIC DEBRIS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 13: SOLIDS/SLUDGES FROM PETROLEUM REFINERY

Waste Description: SOLIDS/SLUDGES FROM PETROLEUM REFINERY

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 16000 US Tons - (2,000 pounds)

Estimated Frequency: 800 loads Annually

Waste Stream 14: SOIL, SOLID & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS & PESTICIDES

Waste Description: SOIL, SOLID & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS & PESTICIDES

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 15: SOIL, SOLIDS & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS

Waste Description: SOIL, SOLIDS & DEBRIS CONTAMINATED WITH HALOGENATED, NON-HALOGENATED ORGANICS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 16: SOLIDS, SOILS & SLUDGES WITH ORGANICS

Waste Description: SOLIDS, SOILS & SLUDGES WITH ORGANICS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 17: SOLIDS, SOILS & SLUDGES WITH INORGANICS

Waste Description: SOLIDS, SOILS & SLUDGES WITH INORGANICS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 18: ORGANIC SOLID WASTE FROM TRANSFER STATION

Waste Description: ORGANIC SOLID WASTE FROM TRANSFER STATION

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 19: INORGANIC SOLID WASTE FROM TRANSFER STATION

Waste Description: INORGANIC SOLID WASTE FROM TRANSFER STATION

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, solid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3077

Total Volume to be Exported: 8000 US Tons - (2,000 pounds)

Estimated Frequency: 400 loads Annually

Waste Stream 20: SPENT HALOGENATED SOLVENTS & SLURRIES

Waste Description: SPENT HALOGENATED SOLVENTS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Toxic, liquids, organic, n.o.s.

DOT Hazard Class: 6.1 DOT I.D. No. UN2810

Total Volume to be Exported: 4000000 Gallons (US)

Estimated Frequency: 800 loads Annually

Waste Stream 21: SPENT TOXIC, INORGANIC LIQUIDS & SLURRIES

Waste Description: SPENT TOXIC, INORGANIC LIQUIDS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Toxic liquid, inorganic, n.o.s.

DOT Hazard Class: 6.1 DOT I.D. No. UN3287

Total Volume to be Exported: 4000000 Gallons (US)

Estimated Frequency: 800 loads Annually

Waste Stream 22: ALKALINE SOLUTIONS CONAINTING HEAVY METALS

Waste Description: ALKALINE SOLUTIONS CONAINTING HEAVY METALS

EPA Waste Code:

DOT Shipping Name: Caustic alkali liquids, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN1719

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 23: WASTE ACIDS

Waste Description: WASTE ACIDS

EPA Waste Code:

DOT Shipping Name: Chromic acid solution

DOT Hazard Class: 8 DOT I.D. No. UN1755

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 24: WASTE CORROSIVE LIQUIDS & SLURRIES

Waste Description: WASTE CORROSIVE LIQUIDS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Corrosive liquids, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN1760

Total Volume to be Exported: 4000000 Gallons (US)

Estimated Frequency: 800 loads Annually

Waste Stream 25: WASTE ACIDS

Waste Description: WASTE ACIDS

EPA Waste Code:

DOT Shipping Name: Nitrating acid mixtures with not more than 50 percent nitric acid

DOT Hazard Class: 8 DOT I.D. No. UN1796

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 26: HYDROXIDE SOLUTIONS

Waste Description: HYDROXIDE SOLUTIONS

EPA Waste Code:

DOT Shipping Name: Sodium hydroxide solution

DOT Hazard Class: 8 DOT I.D. No. UN1824

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 27: BLENDED/BULKED NON-HALOGENATED, CORROSIVE, TOXIC LIQUIDS & SLURRIES

Waste Description: BLENDED/BULKED NON-HALOGENATED, CORROSIVE, TOXIC LIQUIDS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Corrosive liquids, toxic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN2922

Total Volume to be Exported: 4000000 Gallons (US)

Estimated Frequency: 800 loads Annually

Waste Stream 28: WASTE ACIDS

Waste Description: WASTE ACIDS

EPA Waste Code:

DOT Shipping Name: Battery fluid, acid

DOT Hazard Class: 8 DOT I.D. No. UN2796 Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 29: WASTE CORROSIVE ACIDIC, INORGANIC LIQUIDS AND SLURRIES

Waste Description: WASTE CORROSIVE ACIDIC, INORGANIC LIQUIDS AND SLURRIES

EPA Waste Code:

DOT Shipping Name: Corrosive liquid, acidic, inorganic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN3264

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 30: WASTE CORROSIVE ACIDIC, ORGANIC LIQUIDS AND SLURRIES Waste Description: WASTE CORROSIVE ACIDIC, ORGANIC LIQUIDS AND SLURRIES

EPA Waste Code:

DOT Shipping Name: Corrosive liquid, acidic, organic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN3265

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 31: WASTE CORROSIVE LIQUIDS & SLURRIES

Waste Description: WASTE CORROSIVE LIQUIDS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Corrosive liquid, basic, inorganic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN3266

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 32: WASTE CORROSIVE BASIC, ORGANIC, LIQUIDS & SLURRIES

Waste Description: WASTE CORROSIVE BASIC, ORGANIC, LIQUIDS & SLURRIES

EPA Waste Code:

DOT Shipping Name: Corrosive liquid, basic, organic, n.o.s.

DOT Hazard Class: 8 DOT I.D. No. UN3267

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 33: NEUTRALIZED SOLUTIONS FROM METAL FINISHING WASTE TREATMENT PROCESSES

Waste Description: NEUTRALIZED SOLUTIONS FROM METAL FINISHING WASTE TREATMENT PROCESSES

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 34: PETROLEUM REFINERY WASTE LIQUIDS

Waste Description: PETROLEUM REFINERY WASTE LIQUIDS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 35: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

Waste Description: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 36: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

Waste Description: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 37: AQUEOUS LIQUIDS WITH METALS AND INORGANICS

Waste Description: AQUEOUS LIQUIDS WITH METALS AND INORGANICS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 38: HALOGENATED/NON-HALOGENATED ORGANIC RICH LIQUIDS Waste Description: HALOGENATED/NON-HALOGENATED ORGANIC RICH LIQUIDS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9

DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 39: HALOGENATED/NON-HALOGENATED LEAN ORGANIC LIQUIDS Waste Description: HALOGENATED/NON-HALOGENATED LEAN ORGANIC LIQUIDS

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 40: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

Waste Description: INORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

Waste Stream 41: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

Waste Description: ORGANIC SLUDGES & SLURRIES WASTE FROM WASTE TRANSFER SITE

EPA Waste Code:

DOT Shipping Name: Environmentally hazardous substances, liquid, n.o.s.

DOT Hazard Class: 9 DOT I.D. No. UN3082

Total Volume to be Exported: 2000000 Gallons (US)

Estimated Frequency: 400 loads Annually

The following Waste Codes apply to the above Waste Streams:

D001 ,D002 ,D003 ,D004 ,D005 ,D006 ,D007 ,D008 ,D009 ,D010 ,D011 ,D012 ,D013 ,D014 ,D015 ,D016 ,D017 ,D018 ,D019 ,D020 ,D021 ,D022 ,D023 ,D024 ,D025 ,D026 ,D027 ,D028 ,D029 ,D030 ,D031 ,D032 ,D033 ,D034 ,D035 ,D036 ,D037 ,D038 ,D039 ,D040 ,D041 ,D042 ,D043 ,F001 ,F002 ,F003 ,F004 ,F005 ,F006 ,F007 ,F008 ,F009 ,F010 ,F011 ,F012 ,F019 ,F024 ,F025 ,F032 ,F035 ,F037 ,F038 ,F039 ,K001 ,K002 ,K003 ,K004 ,K005 ,K006 ,K007 ,K008 ,K009 ,K010 ,K011 ,K013 ,K014 ,K015 ,K016 ,K017 ,K018 ,K019 ,K020 ,K021 ,K022 ,K023 ,K024 ,K025 ,K026 ,K027 ,K028 ,K029 ,K030 ,K031 ,K032 ,K033 ,K034 ,K035 ,K036 ,K037 ,K038 ,K039 ,K040 ,K041 ,K042 ,K043 ,K044 ,K045 ,K046 ,K047 ,K048 ,K049 ,K050 ,K051 ,K052 ,K060 ,K061 ,K062 ,K064 ,K065 ,K066 ,K069 ,K071 ,K073 ,K083 ,K084 ,K085 ,K086 ,K087 ,K088 ,K090 ,K091 ,K093 ,K094 ,K095 ,K096 ,K097 ,K098 ,K099 ,K100 ,K101 ,K102 ,K103 ,K104 ,K105 ,K106 ,K107 ,K108 ,K109 ,K110 ,K111 ,K112 ,K113 ,K114 ,K115 ,K116 ,K117 ,K118 ,K123 ,K124 ,K125 ,K126 ,K131 ,K132 ,K136 ,K141 ,K142 ,K143 ,K144 ,K145 ,K147 ,K148 ,K149 ,K150 ,K151 ,K156 ,K157 ,K158 ,K159 ,K161 ,K169 ,K170 ,K171 ,K172 ,K174 ,K175 ,P001 ,P002 ,P003 ,P004 ,P005 ,P006 ,P007 ,P008 ,P009 ,P010 ,P011 ,P012 ,P013 ,P014 ,P015 ,P016 ,P017 ,P018 ,P020 ,P021 ,P022 ,P023 ,P024 ,P026 ,P027 ,P028 ,P029 ,P030 ,P031 ,P033 ,P034 ,P036 ,P037 ,P038 ,P039 ,P040 ,P041 ,P042 ,P043 ,P044 ,P045 ,P046 ,P047

P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, ,P068 ,P069 ,P070 ,P071 ,P072 ,P073 ,P074 ,P075 ,P076 ,P077 ,P078 ,P081 ,P082 ,P084 ,P085 ,P087 P104, P105, P104, P107, P101, P102, P101, P109, P097, P098, P097, P098, P099, P101, P102, P103, P104, P105, P106 P108 ,P109 ,P110 ,P111 ,P112 ,P113 ,P114 ,P115 ,P116 ,P118 ,P119 ,P120 ,P121 ,P122 ,P123 ,P127 P128 ,P185 ,P188 ,P189 ,P190 ,P191 ,P192 ,P194 ,P196 ,P197 ,P198 ,P199 ,P201 ,P202 ,P203 ,P204 ,P205 ,U001 ,U002 ,U003 ,U004 ,U005 ,U006 ,U007 ,U008 ,U009 ,U010 ,U011 ,U012 ,U014 ,U015 .000, 2001, ,U031 ,U032 ,U033 ,U034 ,U035 ,U036 ,U037 ,U038 ,U039 ,U041 ,U042 ,U043 ,U044 ,U045 ,U046 ,U047 ,U048 ,U049 ,U050 ,U051 ,U052 ,U053 ,U055 ,U056 ,U057 ,U058 ,U059 ,U060 ,U061 ,U062 ,U063 ,U064 ,U066 ,U067 ,U068 ,U069 ,U070 ,U071 ,U072 ,U073 ,U074 ,U075 ,U076 ,U077 ,U078 ,U079 ,U080 ,U081 ,U082 ,U083 ,U084 ,U085 ,U086 ,U087 ,U088 ,U089 ,U090 ,U091 ,U092 ,U093 .0110, 2010, 1004, U107, U104, U107, U104, U101, U102, U104, U105, U106, U107, U108, U109, U110 ,U111 ,U112 ,U113 ,U114 ,U115 ,U116 ,U117 ,U118 ,U119 ,U120 ,U121 ,U122 ,U123 ,U124 ,U125 ,U126 ,U127 ,U128 ,U129 ,U130 ,U131 ,U132 ,U133 ,U134 ,U135 ,U136 ,U137 ,U138 ,U140 ,U141 ,U142 ,U143 ,U144 ,U145 ,U146 ,U147 ,U148 ,U149 ,U150 ,U151 ,U152 ,U153 ,U154 ,U155 ,U156 ,U157 ,U158 ,U159 ,U160 ,U161 ,U162 ,U163 ,U164 ,U165 ,U166 ,U167 ,U168 ,U169 ,U170 ,U171 ,U172 ,U173 ,U174 ,U176 ,U177 ,U178 ,U179 ,U180 ,U181 ,U182 ,U183 ,U184 ,U185 ,U186 ,U187 ,U188 ,U189 ,U190 ,U191 ,U192 ,U193 ,U194 ,U196 ,U197 ,U200 ,U201 ,U202 ,U203 ,U204 ,U205 ,U206 ,U207 ,U208 ,U209 ,U210 ,U211 ,U213 ,U214 ,U215 ,U216 ,U217 ,U218 ,U219 ,U220 ,U221 ,U222 ,U223 ,U225 ,U226 ,U227 ,U228 ,U234 ,U235 ,U236 ,U237 ,U238 ,U239 ,U240 ,U243 ,U244 ,U246 ,U247 ,U248 ,U249 ,U271 ,U278 ,U279 ,U280 ,U328 ,U353 ,U359 ,U364 ,U367 ,U372 ,U373 ,U387 ,U389 ,U394 ,U395 ,U404 ,U409 ,U410 ,U411

You may ship this waste to the following receiving facility/foreign importer:

CLEAN HARBORS CANADA, INC. 4090 TELFER ROAD, CORUNNA, ON, CA ON0039017

Shipments may occur during the period from May 30, 2013, to May 29, 2014.

Please be advised of the following special RCRA requirements for export shipments of hazardous waste. These requirements are found at Title 40 Code of Federal Regulations, Part 262, Subpart E-Exports of Hazardous Waste.

1. If the major terms of the original notice should change, you must renotify EPA. Please send your renotification to: Environmental Protection Agency, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington D.C. 20460, "Attention: Notification to Export" prominently displayed on the front of the envelope. (§262.53(c))

2. The hazardous waste manifest for each shipment must identify the point of departure from the

United States in Item 16. (§262.54(c))

3. A copy of this Acknowledgment of Consent must be attached to the U.S. hazardous waste manifest that accompanies each shipment of hazardous waste. (§262.54(h))

4. You must provide the transporter with an additional copy of the manifest for delivery to the U.S. Customs official at the point the hazardous waste leaves the United States in accordance with

§263.20(g)(4). (§262.54(i))

5. You must file an exception report with the Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460, if you have not received a copy of the manifest signed by the transporter stating the date and place of departure from the U.S. within forty-five (45) days from the date it was accepted by the initial transporter; if within ninety (90) days from the date the waste was accepted by the initial transporter, the primary exporter has not received written confirmation from the consignee that the hazardous waste was received; and the waste is returned to the United States. (§262.55)
6. You must file an annual report by March 1 of each year with the Environmental Protection Agency, Office of Federal Activities, International Compliance Assurance Division (2254A), Ariel Rios Building, 1200 Pennsylvania Avenue, N.W., Washington, D.C. 20460. (§262.56)

All shipments of hazardous waste must conform to all applicable state and federal hazardous waste regulations and transportation requirements, as well as these specific export requirements.

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Amanda Finnell, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number 202/564-1956, fax number 202/564-0025, finnell.amanda@epa.gov.

Sincerely,

Robert G. Heiss, Director

International Compliance Assurance Division

Office of Federal Activities

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